

Analysis of the *'Equality is not the Same'* and consultant reports



Flemington Kensington Community Legal Centre

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1. Introduction

Victoria Police has released the report from the 2013 inquiry into racial profiling and has launched a 3 year action plan to address community concerns about discriminatory policing and racial profiling.



The '*Equality is not the same*' report and two accompanying consultant reports are available on the Victoria Police website [here](#) and below.

['*Equality is not the same: December 2013*](#) (PDF)

['*Review of field contact policy and processes*](#)' CIRCA – Cultural & Indigenous Research Centre Australia, Final Report November 2013 (Co-author Mary Raftos 02 8585 1313)

['*Learning to Engage*](#)' A review of Victoria Police Cross-Cultural Training Practises, Centre for Cultural Diversity and Wellbeing, Victoria University, Dec 2013

The recommendations from each of these consultant reports are included in Appendix 1 of the *Equality is not the Same*

(Equality) report.

The six month Inquiry, the result of a settlement as part of the [Haile-Michael Federal race discrimination](#) action has resulted in very many key community recommendations being adopted including;

- Australia's first trial of stop and search receipting,
- A data collection and monitoring program
- Policy reforms concerning police field contacts, and
- Substantial reform of cross cultural training provided within Victoria Police.

Overall, Victoria Police's response to the public review of its field contact and cross cultural education policies is indicative of a genuine intention to address racism and racial profiling.

The report contains many crucial acknowledgements and commitments that, *if properly implemented*, could see a genuine reduction in racism and racial profiling by Victoria Police members as well as increasing the overall fairness of and human rights compliance by police members.

The report represents a potential watershed moment for Victoria Police in addressing many of the concerns raised by impacted communities who experience racial profiling. Not since Operation Beacon has such potential for change in policing practices been seen in Victoria.

Although the Equality report was weak on acknowledgement, it needs to be seen alongside the two consultant reports. The three reports form a road map and point to the huge amount of work ahead for the Victoria Police, the Victorian Government and the community.

The following is an analysis of the content, key recommendations and outcomes for stakeholders and to assist strategic planning.

2. Initial reactions

The reports were released first to a group of 30-40 stakeholders of invited agencies and groups on 30 December 2013. Primarily these were groups who had made submissions. There was a Vicpol media conference immediately after this briefing.

Media coverage of the release was limited due to the timing of the release but most major news agencies in Australia covered the release.

"Victoria's Chief Police Commissioner Ken Lay has acknowledged officers have been guilty of racial profiling" - ABC News (31/12/13)

Most of the media quotes from our media team were cautiously positive about the reports.

"It's the outcome of everything we've been fighting for, and it kind of justifies what we've fought for," Mr Issa said - ABC News (31/12/13)

"I certainly don't think it went far enough – there is no single mention of the word racism in the document, which is a bit disappointing as it needs to be addressed," he said.

"There's some comfort that the receipt policy made it into there and also the change to the complaints system. But we've always believed this was a systemic issue, not just a case of a few bad eggs in uniform.

"I think the police commissioner has come a long way from February, when he was saying police officers didn't partake in any of these practices. We want to see this through for three years and then sit down and see if things have improved." Maki Issa– [Guardian Australia](#) (31/12/13)

"There's an acknowledgment by the police that implicit bias exists within the force," Mr Seidel said. "It's a frank and honest assessment of what the police need to do." - Peter Seidel ABC News (31/12/13)

"an encouraging start". – Peter Seidel – [The Age](#) (31/12/13)

One of the Haile-Michael case litigants, Maki Issa, 22, said the group were proud of their achievements, but believed there was a lot of work still to do. "We're still at the beginning," he said. "The day we settled the case was the first day of trying to get some changes to happen." - [The Age](#) (31/12/13)

"Despite the implicit acknowledgement of problems of racial discrimination, there is an unfortunate failure to acknowledge and apologise to the community for the racial bias they've experienced," he said. "But, overall, the report addresses important parts of the

problem, such as clear accountability mechanisms and stop and search. Also, it's good to see that recruits will get training at the academy that challenges their implicit biases and looks at how that affects their interactions with people. "All definitions of institutionalised racism point to a systemic problem in Victoria police but this report does recognise the reforms that need to happen." – Anthony Kelly - [Guardian Australia](#) (31/12/13)

Tiffany Overall (Youthlaw) from *Smart Justice for Young People* provided media release and a [short statement](#) on the outcomes.

The *Victorian Human Rights and Equal Opportunity Commission* (VEOHRC) produced this [public statement](#) welcoming the report and a more detailed point by point [response \(PDF\)](#) to the 3 year action plan – stressing how the commission is looking forward to be involved in all consultation and monitoring aspects of the plan.

3. What's missing?

The *Equality* report lacks any apology or acknowledgment of the deep personal, psychological and community wide impacts of racial discrimination. It fails to acknowledge any of the horrific case stories or harms related in the submissions or forums aside from the reduction in community confidence of police. This was a missed opportunity to provide not only an official acknowledgement, but some critical education or community awareness raising of racial profiling and its impacts. Impacts that were explicit within so many community submissions. No examples are provided in the *Equality* report to demonstrate why change is needed or how police had failed to address this in the past. Instead, as Maki pointed out in one interview, racism or racial profiling is barely mentioned.

Despite a commitment to explicit 'zero tolerance' on racism and racial profiling and review of policies to ensure that they do not lead to racial profiling, the report fails to adopt or propose a definition of racial profiling. This is discussed further below.

There is no mention of or reference to reviewing, reinforcing or improving internal disciplinary procedures when members engage in racist behaviour or profiling – apart from a mention of '*improving supervisory mechanisms*'. This is discussed further below.

4. Zero tolerance to racial profiling

As a critical starting point, the report indicates that Victoria Police now has an explicit zero tolerance policy for racial profiling.

"Victoria Police has a zero tolerance for any form of racial profiling and will act to ensure that our procedures and policies are explicit in our expectation that this practice is not acceptable in any manner or circumstances....we [will] strengthen the visibility of human rights principles in the Victoria Police Manual.....we will examine the United Kingdom...PACE CODE A as an example of good practice." (Equality, page 7).

Importantly, Victoria Police has committed to reviewing its policies:

“We will review our policies to ensure that they do not lead to racial profiling and state explicitly in these that racial profiling is not acceptable and that there is a zero tolerance of this practice in any form.” (Equality, page 7).

PACE CODE A is available [here](#)>

5. Data collection and monitoring



Monitoring field contact ethnicity data to ascertain if they are being applied disproportionately is a critical accountability tool that strongly recommended in the bulk of community submissions received during the inquiry and was a key recommendation in the CIRCA report.

The CIRCA report has separated data monitoring from the question of receipting and asserts that adequate data collection and monitoring can be achieved via the existing LEAP database, specifically by increasing the Field Contact L19 form reporting rate and making the reporting on ethnic appearance a mandatory field and then developing a data monitoring process.

CIRCA have stated that Vicpol are well positioned to implement data monitoring strategies because field contact reports are already collected and recorded in LEAP. However, Police will need to improve the quality of data collected – as Prof Ian Gordon [discovered](#) when analysing 3 years of Nth Melbourne LEAP data.

Vicpol have agreed to undertake data collection and monitoring for field contacts.

“We will revise our field contact data collection, monitoring, analysis and reporting. Our policy revision will enhance accountability measures, such as supervisory oversight.” (Equality, page 8)

Vicpol have agreed to engage external experts due to the complexity of the data collection and reporting process.

Racial data collection programs such as these should be ongoing and not time-limited and it needs to be implemented statewide – so that regional and even local station by station data can be examined.

The privacy concerns around collecting data on ethnic appearance will possibly be controversial as CIRCA have noted – especially if mis-reported by the media or jumped on by internal opposition, and others in the multicultural sector may have concerns, particularly if they perceive it to be about

correlating ethnicity and crime rates. Experts in the UK, Canada and US have well developed privacy and policy guidelines around this issue.

CIRCA have recommended clear guidance in the VPM and codes developed. (CIRCA Recommendation 21)

Critically, all police stops need to be included in this data collection and monitoring - including traffic stops, stops and searches under the various stop and search powers and *not just field contacts*. Comprehensive stop data would be more accurate and able to pick up dis-proportionality across the state.

CIRCA have only vaguely suggested this in their report:

*When considering the recommendations from this review, it will be important that Victoria Police also **consider their applicability to stop and search activity**, as well as other Victoria Police activities more broadly. (CIRCA Chapter 6. P 64)*

This will be an important topic within the advisory groups and other forums. We believe that if police are serious about detecting and reducing racial dis-proportionality then *all* police stops must be included. International experts argue this and there is indication of discrimination within traffic stops and other stop powers.¹

In terms of independent monitoring, CIRCA recommended Vicpol 'work with peak independent bodies (such as VEOHRC) to develop a public reporting process' that addresses accountability and transparency concerns.

Monitoring data may end up being a role of the "Strategic Advisory Committee" mentioned above, or it could end up in the hands of VEOHRC solely. What role other community agencies have advising on and eventually seeing, analysing and commenting upon these data reports is an important question.

CIRCA report was strong on the need for independent review of the data being publically available, noting that it is critical that process are in place for data not to be mis-reported or mis-interpreted.

It recommends work with peak bodies such as IBAC and VEOHRC to develop a public reporting process. The Equality report also mentions the new crime statistics agency announced late last year as a public forum for reporting information and advising. The Equality Report does not specifically commit to public reporting but states; "*we will work through the appropriate public reporting parameters with key stakeholders.*" (p35)

It is important that data collection results are regularly publically reported, or there is a risk that the data will not be collected, or patterns revealed will go unseen. (See, for example, the failure in data collection and oversight of it devised under the Control of Weapons Act search power amendments, OPI Review of Stop and Search Powers 2012).

¹ For more information see Submission to Vicpol by Arnold Bloch Leibler and FKCLC available at: http://www.communitylaw.org.au/flemingtonkensington/cb_pages/files/Victoria%20Police%20Inquiry%20ABL%20FKCLC%20Submission.pdf

Oversight problems are even the case in a closely monitored pilot. It is critical that the public is able to scrutinise results on a regular basis rather than just at the end of process. This will also be something to maintain within the Stakeholder Advisory groups.

As we have stated previously, the hallmarks of an effective field contact data-collection program include:

- The inclusion of *all* field contacts, traffic stops and searches where a racial bias could be evident,(rather than an isolated trial involving one particular type of police stop or search power);
- The complete and comprehensive recording of stops and searches by police to provide best quality data;
- Internal training and compliance measures to reduce under or over-reporting of race specific searches;
- The prohibition and elimination of any formal, informal, or assumed numerical targets for stops and searches as a performance measure;
- Consistent and continual monitoring scrutiny and assessment of data by, or in close collaboration an independent and suitably qualified body;
- A focus upon challenging, rather than justifying, any patterns of disproportionality discovered via the data-collection.

If LEAP data monitoring does provide further evidence of disproportionate stops, as the RDA case expert reports did, then this would substantially vindicate these efforts and place increased emphasis on other policy and training reforms and the importance of receipting.

These recommendations have been taken up in the *Equality* Report in the Year One. It would be pertinent for community agencies and bodies to emphasise this initiative as a priority.

6. The Receipting Trial

“We will examine receipting options to scope, develop and trial a receipting pilot.” (Equality page 9).

The report suggests a pilot receipting program be developed in Year One, trailed in Year Two for one year and then a year to analyse its success.

While the pilot is an excellent recommendation, one year is not sufficient to truly pilot receipting.

The pilot needs to capture sufficient numbers of operations, leadership decisions and events to reveal real patterns. There is still scope to revise this time frame in the first year when the model is being devised. In addition, because data collection will require significant administrative adjustments to be effective, a longer pilot period would justify these changes.

As the Receipting component of a race data collection project has been separated in these reports from ongoing ethnicity/stops data collection and monitoring, it is preferable that the data monitoring proceed whilst the details of the Receipting trial and being worked out.

7. Communication re Field Stops

Victoria Police has committed to communicate to people the reason why they are being stopped:

“Victoria Police will work to adopt a standardised approach to provide every member of the community with certainty about their entitlement to procedural fairness and justice (Equality, page 6).

This is another worthy commitment. The more informed the community is of their rights and consequences of responding to questioning, the more trust the community will have that the police are behaving lawfully.

It is important, however, that the standard approach is subject to community scrutiny before it is adopted to ensure it actually does convey meaningful rights rather than increasing the stopped person’s feeling of being coerced.

For example the standard “you have the right to be silent and to obtain legal advice” given before formal interviews is often conveyed in a way that inhibits a persons from exercising their right to silent or obtain legal advice. This is partly because its formulaic delivery makes it incomprehensible to many and partly because the message that tends to actually be conveyed to people in custody is that any attempt to exercise these rights will increase their time in custody and anger the interviewing police officers. The standardised approach will need to be in plain language and conveyed with the express intention of respecting the person’s right to informed consent or *not to* consent. (See below)

8. Informed Consent

Victoria Police has also acknowledged that in the absence of legislative (or common law) basis for searches, *informed* consent is required:

“A specific source of authority, including legislation or informed consent...applies to the conduct of a search of a person.” (Equality, page 17).

Informed consent requires a person to know they are free not to consent without suffering adverse consequences.

This reform would be a significant breakthrough in the status quo and if taught to police (throughout the chain of command) could lead to an entirely different approach in searches and much greater trust in police by the community.

Furthermore, Victoria Police has indicated that hunches or suspicions are not a sufficient basis on which to stop a person:

“It is expected that police members make objective, evidence based decision making in the field” (Equality page 7).

Again, this will make a significant difference to the way police currently conduct stops and searches and are trained to conduct stops and searches. This again is a very welcome breakthrough.

9. Strategic Advisory Committee and stakeholder advisory groups

The Chief Commissioner will chair the Strategic Advisory Committee and this is likely to be under the auspices of the new *Priority Communities Division* of Victoria Police. When this committee will be established or who will be invited / selected to participate is not yet known.

Also, to be established by Vicpol are a series of “Community/Stakeholder Advisory Groups” – under the new Priority Communities Division.

There is currently no information about where, when and how these will be established however there are multiple recommendations that have specified community input and consultation.

It is likely that these stakeholder groups will be established early in 2014 and are seen as part of the establishing infrastructure phase in Year One.

Key questions include:

1. who will be represented on these groups;
2. the terms of reference;
3. how wide will representation be; and,
4. their influence on Vicpol decision making.

10. Reviewing Internal Complaints Process

The CIRCA Report confirmed a general perception that Victoria Police complaint handling was not fair, transparent or timely, and resulted in a perceived lack of accountability and loss of faith in the process. (Section 5.3, P63)

“There was a strong belief that Victoria Police should improve complaints processes and recognise that a lack of complaints may not be an indicator of excellent service, but rather of a lack of community confidence in the process. This is something that was acknowledged by some Victoria Police members involved in the review.”

Despite being outside the scope of the reviews Vicpol found it was “*relevant as many of the concerns with the field contact process were exacerbated by lack of awareness and understanding of and dissatisfaction with the complaint handling process*”.²

Vicpol have stated that will review their “*communication and feedback mechanisms, including the accessibility of information about compliant handling options..*”

There was no mention in the *Equality* report of any reforms to internal disciplinary or investigative processes.

This did not go far beyond what the CIRCA report recommended. However, one potential reform mentioned by CIRCA was

“A few Victoria Police members spoke of the robust review processes adopted in a number of areas, with the risk management and review process for vehicle pursuits given as an example. It was suggested that these review processes could be adopted for field contacts, as this would enable the organisation to determine if individual members are behaving in a way that meets expectations.”

This section of the report provides yet more evidence of wide-spread dissatisfaction with internal complaints process which, arguably, will not be mitigated simply by better communication and feedback.

It is clear from all the submissions that addressed complaints that the community does not trust complaints that are investigated and adjudicated by police. While the report acknowledges that it is bound by legislation – it was open to Victoria Police to acknowledge that there is an ongoing concern with complaints being investigated by police.

For example, the NSW Police Integrity Commission (PIC) in its 2013 [Operation Calyx Report](#) stated:

“If critical incidents were investigated by a body that was independent of the NSWPF, then there would be greater public confidence in the integrity of the investigations and less risk of the investigations failing to be properly conducted.”³

The PIC then stated:

“The Commission considers that it is for the government to decide whether the very large allocation of resources required to set up and operate a new body to investigate critical incidents would be warranted.”⁴

Effective complaint investigation is a critical accountability measure that was missing from the reforms brought in by Operation Beacon. It is *still* missing from the recommendations of this report.

² *Equality is not the same* report, Vicpol Dec 2103 p 8

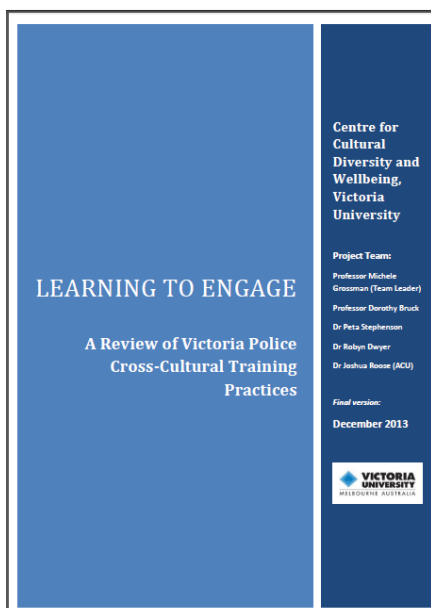
³ <http://www.pic.nsw.gov.au/files/reports/PIC%20Calyx%20Report.pdf> at paragraph 8.14

⁴ As above at paragraph 8.17.

The lack of an overhaul of the current internal complaint investigation process is likely to inhibit the transformative potential the recommendations in Victoria Police’s report may have otherwise had.

As Tiffany Overall from Youthlaw had pointed out –*“While pleased Victoria Police will be reviewing aspects of their internal complaints process, rebuilding the community’s confidence in the complaints process requires complaints against police being investigated by a body independent of Victoria Police.”*

11. Cross Cultural Training Reforms



The *Learning to Engage* report from the Centre for Cultural Diversity and Wellbeing, Victoria University, provides a comprehensive and useful overview of cross-cultural training in Victoria Police. It makes a wide range of recommendations for improved curriculum, delivery, training methods and assessment.

The *Learning to Engage* report found that:

“The issue of direct and implicit bias, racism and racial and ethnic profiling emerged throughout the Review as the third and single most important issue in cross-cultural education and training that communities wanted to see urgently addressed by Victoria Police...”

The importance of including a thorough grounding in knowledge, understanding and practice implications for direct and implicit bias, racism and racial or ethnic profiling in approaches to police cross - cultural education and training therefore cannot be overstated.”

(Learning to Engage, p9-10)

Best practice was found to include:

- Identification of both overt and implicit bias in trainees, including questioning of the underlying assumptions that inform these biases.
- Clear definition and identification of racism and racial profiling, and the impacts of these on communities and on police-community relations.
- Development of strong communication skills that help build trust and mutual respect between police and diverse communities.
- Strategies for addressing through education and training biases identified through diagnostic or screening measures during recruitment

(Learning to Engage, P 5)

Its key recommendations are for more robust training that includes key anti-racism components and is contained in Recommendation 24:

Redevelop 'Current Issues in Policing' as a module focused on understanding and preventing direct and implicit bias, racism and racial profiling as an existing part of the current syllabus, drawing on best practice examples provided in the international literature and police departments in other countries.

This was reflected in the Equality Report as a Year one commitment:

"Create and implement training packages to develop police members' knowledge, understanding and recognition of unconscious bias and to provide them with the tools and capabilities to ensure unconscious bias does not impact their decision-making. These training packages will form part of the redeveloped human rights refresher training." (Equality p 52)

Language around 'bias' and racism

Interestingly, whilst the Learning to Engage report uses the phrase "*direct and implicit bias*" regularly throughout the document. The Equality Report has predominantly used the term '*unconscious bias*', perhaps reflecting that the term is perceived as less controversial.

The Learning to Engage report spends considerable time critiquing the concept of 'cultural competency' which is useful. Unfortunately, the concept of 'direct and implicit bias' is not examined or defined in any way, not is racism or racial profiling.

However, an example is provided to illustrate '*the false logic created by implicit bias*' in Chapter 4:

"A mid-ranking officer related a case in which a large brawl broke out between a group of African-Australian youth and some young Anglo-Australians at Box Hill. When the police arrived on the scene they immediately sent off all the white youth, and held the young Africans for questioning. For the officer recounting the scenario, it was 'that classic example of, well we've been programmed, we've heard about how much trouble [African-Australians] cause, therefore these are [African] people, therefore they must have been the ones that caused the trouble.' In reality, however, and as the African-Australian youth pointed out at the time of the incident, 'these white guys were the ones who completely started it all. They initiated contact, they initiated the fight, and there is film footage and everything that identified clearly this is what happened."

(Learning to Engage p92.)

Whole of career training

Importantly, the Learning to Engage report has made strong recommendations on the importance and development of whole-of-career training for police out of recognition that training essentially stops after the Academy. This is contained in Recommendation 2:

Ensure that all police officers receive regular compulsory refresher training on human rights and cultural and community diversity principles, obligations and skills in the field.

Best practice approaches to this were identified as;

- *Targeted training aimed as required to shift entrenched station subcultures that do not evidence the values of the organisation in relation to cultural and community diversity*
- *Ongoing whole-of-career training at various levels including front-line officers, supervisors and managers, including refreshers and advanced training to maintain up to date knowledge of theory and practice in relation to policing and diverse communities.*
- *Cross-cultural training specifically targeting officers' rank and responsibilities.*

(Learning to Engage p4)

It also makes strong recommendations for the involvement, inclusion and partnership with community and external agencies in the development and delivery of training to police and best practise was seen as:

Dialogue with and regular input from community partners about cross-cultural education and training content, including constructive engagement with critical approaches to training and procedures.

The design and delivery of training by qualified personnel drawn from police services, educational institutions and community partners.

(Learning to Engage p5)

12. Reactions

Political reaction

Acting Premier Peter Ryan was quoted in several media sources.

"I do not want racial profiling, as such, to occur in Victoria, with Victoria police. I think Victoria police need to exercise their responsibilities in a manner which is completely equitable to the populace at large, and I certainly don't want them being held up in a manner which is not appropriate, and handing out bits of paper, or whatever it might be in a way that might even deter them from making inquiries in the first place. We don't want that."

2 January 2014 3AW Radio Morning show

Police Association reaction

Greg Davies from the Victorian Police association come out clearly [opposed](#) to receipting

He told Fairfax Radio the receipt system would create unnecessary work for officers.

"It creates a rod for the backs of police that are already cowed with the responsibility and oversight as it is."

We have seen no other official statement from the Police association about the issue.

Age Editorial

The launch prompted another significant [editorial](#) from The Age which stated;

"The response's recommendations will take three years to implement - but there is much work to be done. It will include frequent public consultations, reforming internal educational procedures and revising the process of field contact, when police detain a person in special or suspicious circumstances. One of the most potentially effective proposals is a trial scheme of police-issued receipts, explaining the reasons why a person has been detained and that person's ethnicity. This data has the potential to be an invaluable public resource.

All these changes will be crucial not only to enable proper shifts of attitude and practice within the police force, but in restoring public confidence outside it. Anything less than this undermines the prime purpose of the police, who are there to serve and guard all members of the community, without fear or favour. This must always be a matter of protection, not persecution. As an attendee at one of the public forums said: "The law is the law - you don't need to know my culture to treat me with respect as a human being."

There are six people in particular who deserve lasting gratitude: the young African-Australian men who courageously and tirelessly sought justice for what they rightly saw as a threat to their basic rights."

13. Final Comments and the way forward:

Flemington Kensington Community Legal Centre congratulates the Victoria Police for this important initiative and looks forward to working with police and stakeholders to see the implementation of this ambitious plan over the next 3 years.

We are committed to actively supporting our clients, community members and organisations including young people, to play an active part in the various consultative and advisory forums ahead.

Continued critical engagement from community members, organisations, agencies, peak bodies over the next three years will be needed to ensure the effective implementation of these important reforms.

A notable aspect of the *Equality* report is the strong emphasis and weight given to strategic communications and community engagement strategies when these do not appear as strong priorities within either of the two consultant reports.

Vicpol have made Year One commitments to *produce and publish an organisational Community Engagement Strategy* and to *develop a cultural, community and diversity education strategy*.

One concern is that these major policy initiatives may be prioritised over the more difficult and controversial aspects of the plan such as data collection and monitoring, the receipting trial and policy reform.

This centre remains committed to listen to and advocate for victims of racially discriminatory policing. We will continue to bring these hidden stories into the public sphere, take action on their behalf and ensure that any reforms committed to by Victoria Police are informed by these experiences. Ultimately, it will be the experiences of Victoria's diverse communities, as reported to community legal centres, youth workers and community agencies that will tell us if the action plan is successful or not in reducing racially discriminatory practises.

In the short term FKCLC will be holding a series of public forums in North Melbourne, Footscray, Springvale and Werribee during February 2014 to inform communities and local agencies about the 3 year plan.

We will have a range of expert and community views on the three year action plan and the challenges and opportunities ahead.

More information about these forums is available [here](#)>

Racial Profiling in Victoria: Submission to Victoria Police by Arnold Bloch Leibler and FKCLC is available [here](#)>

14. Contact:

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