

## APPENDIX A

# Submissions and comments

We have consulted with Victoria Police, and we considered its views when reaching our audit conclusions. As required by the *Audit Act 1994*, we gave a draft copy of this report to Victoria Police and asked for its submissions and comments.

Responsibility for the accuracy, fairness and balance of those comments rests solely with the agency head.

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### Responses were received as follows:

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VICTORIA POLICE

**Shane Patton APM**  
**Chief Commissioner of Police**

Our Ref: FF - 165474  
Your Ref: File No. 34630 21

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Victorian Auditor-General  
Mr. Andrew Greaves  
Level 31/35 Collins Street,  
Melbourne, VIC, 3000

Dear Mr. Greaves,

**Victoria Police response to the proposed Performance Audit Report *Managing body worn cameras***

Thank-you for the opportunity to provide a response to your proposed report, dated 18 May 2022.

Previous VAGO audit findings have greatly assisted Victoria Police, to enhance service delivery, improve accountability and strengthen risk management.

Victoria Police accepts proposed recommendations two (2), seven (7) and eight (8), however due to external constraints, practical barriers, resourcing, and financial limitations, recommendations one (1), three (3) and four (4) are accepted in-principle only.

Recommendation five (5) is not accepted as Victoria Police has an established robust information security system in place. Recommendation six (6) is also not accepted due to the significant barriers in the ability to capture the impact of body worn cameras (BWC) in resolving or assisting proceedings. These difficulties were highlighted in the project closure report.

Please find attached a table that outlines the Victoria Police response, action, and anticipated completion dates for each of the eight recommendations (Attachment A).

Yours sincerely,

Shane Patton APM  
**Chief Commissioner**

31 / 5 /2022

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**Attachment A**

**Victoria Police action plan to address recommendations from *Body Worn Camera Audit*.**

No.	VAGO recommendation	Action	Completion date
1	<p><b>Recommendation 1</b> - implements a compliance monitoring tool for police officers that:</p> <ul style="list-style-type: none"> <li>• reduces manual processes and improves automation as much as possible</li> <li>• incorporates detailed baseline data that captures all operational instances police officers are required to record</li> <li>• measures compliance against its body-worn camera activation framework (see Sections 2.1 and 2.2 1 – Implements)</li> </ul>	Accept in principle. Victoria Police will develop a business case to implement improved reporting.	June 2023
2	<p><b>Recommendation 2</b> - establishes guidance and expectations for using its recently developed body-worn camera performance monitoring dashboard (see Section 2.2)</p>	Accept. Victoria Police will develop a communication plan, including referencing and promoting the dashboard in BWC operational guidelines.	March 2023
3	<p><b>Recommendation 3</b> - implements a password policy that is compliant with the Australian Government's Information Security Manual (see Section 2.3)</p>	Accept in principle. Noting the program of ██████████ is owned by ██████████. Victoria Police will work with ██████████ to identify the deployment of passphrases to uplift the security of passwords across the organisation.	September 2022

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Response provided by the Chief Commissioner, Victoria Police—continued

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4	<b>Recommendation 4</b> - improves the detail of data in its cloud-based storage system to allow efficient monitoring and auditing processes (see Section 2.3)	Accept in principle. Victoria Police will engage with the vendor regarding more efficient monitoring and auditing processes. Implementation of this recommendation will be subject to the cloud system capability and financial costs.	June 2023
5	<b>Recommendation 5</b> - establishes a policy for regularly and consistently reviewing audit logs to reduce the risk of mishandling body-worn camera footage (see Section 2.3)	Not accepted. This audit did not identify any mishandling of BWC footage. BWC is no different to any other information system managed and used by Victoria Police. Victoria Police as an organisation for these types of systems adopts a validation approach due to the sheer volume of different systems, and data /information contained within them. This audit identified that Victoria Police has a sufficiently robust information security system related to BWC.	
6	<b>Recommendation 6</b> - develops monitoring and reporting processes that allow it to measure the use of body-worn camera footage in legal proceedings and complaints against police officers and capture its impact on outcomes (see Sections 3.2 and 3.3)	Not accepted. Victoria Police has identified challenges in quantitative and qualitative measurement of BWC footage in legal proceedings and complaints against police officers. While access to BWC footage is very useful to either challenge issues raised by defence or resolve evidentiary or factual points of contention, it is difficult to specifically measure reduction in delay or resolution rates brought about by the provision of BWC footage. It can be deduced that BWC footage is the deciding factor in resolving some matters, but the metric cannot be definitive as the instructions to an accused by counsel often aren't known. Many different types of evidence are relied upon in legal proceedings. Reporting on the impact of outcomes as a direct result of BWC footage would therefore not be accurate and could be misleading.	

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Response provided by the Chief Commissioner, Victoria Police—continued

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7	<b>Recommendation 7</b> - implements and uses a benefits management framework to ensure that any proposed benefits realisation plans it creates for future projects include outcomes targets that are achievable, measurable, specific, and consistent (see Section 3.3)	Accept. Victoria Police will explore opportunities to strengthen guidance regarding a benefits management framework.	May 2023
8	<b>Recommendation 8</b> - ensures it provides refresher training on body-worn cameras when it undertakes major updates or changes policies or equipment, and for users whose position or location means that they do not use body-worn cameras regularly (see Section 3.4)	Accept. Victoria Police will provide training on body worn cameras when it undertakes major updates or changes policies or equipment, to relevant sworn employees.	As required.

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