



The Australian Crime Commission's implementation of recommendations

ARISING FROM A REVIEW OF THE CORPORATE AND
OPERATIONAL
IMPLICATIONS FOR THE AUSTRALIAN CRIME COMMISSION
ARISING FROM ALLEGED CRIMINAL ACTIVITY
BY TWO FORMER SECONDEES

NOVEMBER 2004

Findings of an own motion investigation undertaken
by the Commonwealth Ombudsman Prof. John McMillan under the *Ombudsman Act 1976*

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Executive Summary

In February 2004, the Chief Executive Officer (CEO) of the Australian Crime Commission (ACC), Mr Milroy advised the Commonwealth Ombudsman, Prof. John McMillan, that the ACC had engaged Yarrimbah Consulting, Mr Bill Stoll APM and Mr John Valentin APM, to undertake a review of the corporate and operational implications for the ACC arising from alleged criminal activity by two former secondees.

The Stoll/Valentin report, *A review of the operational and corporate implications arising from the alleged activities of certain police secondees to the former National Crime Authority and Australian Crime Commission during the period 28 February 2000 to 18 February 2004: A report commissioned by the Australian Crime Commission*, was finalised on 7 June 2004. A copy was provided to the Ombudsman shortly thereafter.

Following his consideration of the Stoll/Valentin report, and a personal briefing from the ACC, the Ombudsman decided that an investigation should be conducted under section 5(1)(b) of the *Ombudsman Act 1976 (Cth)* (the Ombudsman Act) into the Stoll/Valentin review.

The Ombudsman made three specific recommendations to the ACC, including that the ACC should implement the recommendations made in the Stoll/Valentin report. He also forecast that he intended to commence a further own motion investigation within six months of his report in order to monitor the ACC's progress in implementing the Stoll/Valentin report and his recommendations.

On 27 October 2004, the Ombudsman advised Mr Milroy that he intended to conduct an own motion investigation into the implementation of the recommendations, under section 5(1)(b) of the Ombudsman Act. This investigation would seek to determine whether the actions taken by the ACC constituted an appropriate and proportional response to the recommendations.

The investigation consisted of an examination of the policies, procedures or staff directives created or revised by the ACC in response to the recommendations. The investigation report does not contain an analysis of each action taken by the ACC in response to the Stoll/Valentin recommendations, as the Ombudsman was satisfied that the Stoll/Valentin review had met its Terms of Reference and was a sufficient response to the issues raised in the allegations of criminal activity. Further, the Ombudsman had no independent knowledge on which to base any comparison of new and previous policies and procedures.

The Ombudsman was satisfied that the ACC had developed policies and programs to promote the concepts of professionalism and integrity as its primary corruption risk management approach, and commended the ACC for its commitment not only to developing these documents, but to formulating a strategy to address the issues that had been identified.

The Ombudsman was satisfied that using strategies to ensure that managers do not suspend disbelief, and that trust is not misplaced, are vital elements of a successful anti-corruption or integrity framework. He therefore formed the opinion that the actions taken by the ACC were appropriate and proportional responses to the Stoll/Valentin review and the Ombudsman's recommendations.

He decided that further investigation of the ACC's implementation of the recommendations was not warranted, and that the ACC's internal accountability mechanisms, its reports to the ACC Board, and its interactions with the Parliamentary Joint Committee on the ACC will ensure that the ACC continues to develop its integrity framework.

Introduction

1.1 In public hearings commencing 19 February 2004, the New South Wales Police Integrity Commission (PIC) received evidence to support allegations that a secondee to the Australian Crime Commission (ACC) (secondee 1¹) had engaged in criminal activities while seconded to the ACC.

1.2 In hearings in April 2004, further evidence was heard by the PIC that another former secondee to the ACC, secondee 2, had also engaged in alleged criminal activity.

1.3 In February 2004, the Chief Executive Officer (CEO) of the ACC, Mr Alastair Milroy, advised me that the ACC had engaged Yarrimbah Consulting, Mr Bill Stoll APM and Mr John Valentin APM, to undertake a review (the Stoll/Valentin review) of the corporate and operational implications for the Australian Crime Commission (ACC) arising from alleged criminal activity by the two former secondees.

1.4 The Stoll/Valentin report, *A review of the operational and corporate implications arising from the alleged activities of certain police secondees to the former National Crime Authority and Australian Crime Commission during the period 28 February 2000 to 18 February 2004: A report commissioned by the Australian Crime Commission*, was finalised on 7 June 2004. A copy was provided to me shortly thereafter.

1.5 Following my consideration of the Stoll/Valentin report, and a personal briefing from the ACC, I decided that an investigation should be conducted under section 5(1)(b) of the *Ombudsman Act 1976 (Cth)* (the Ombudsman Act) into the Stoll/Valentin review.

1.6 The Commonwealth Ombudsman has jurisdiction over the ACC by virtue of the Ombudsman Act. In this role, the Ombudsman has the capacity to:

- investigate action, being action that relates to a matter of administration taken by a Department or by a prescribed authority, and in respect of which a complaint has been made to the Ombudsman (s 5(1)(a)); and
- of his or her own motion, investigate any action, being action that relates to a matter of administration taken by a Department or by a prescribed authority (s 5(1)(b)).

1.7 That investigation sought to determine the extent to which:

- the review met the terms of reference provided by the ACC; and
- the recommendations reflected the operational implications identified in the review report.

1.8 My investigation concluded that:

- the Stoll/Valentin review methodology was sound, and all practical and necessary precautions were taken to preserve and provide for the continuity of evidence, as appropriate to the circumstances;

¹ For privacy reasons, the names of the former ACC secondees have been deleted in this report.

- as concluded by the Stoll/Valentin review, there were failures in the management and compliance systems of the former National Crime Authority and insufficient action was taken to ensure that these failures could not flow to the ACC;
- there was information to suggest that those management and compliance failures allowed the two secondees to exploit those weaknesses, and ultimately, enabled the alleged criminal activities to be committed using public assets, and to go undetected for a substantial period of time; and
- the Stoll/Valentin recommendations, in general, were appropriate and proportionate responses to the issues identified by the Stoll/Valentin review, having regard to the constraints on the Stoll/Valentin review because of secrecy caveats on information provided to the ACC and the consultants by the New South Wales Police Integrity Commission.

1.9 I made three recommendations to the ACC about the development of management and compliance systems to address deficiencies that I identified in the Stoll/Valentin report. These recommendations were only made where I believed that the findings of the Stoll/Valentin report were not sufficiently addressed by the review's recommendations. I did not consider it appropriate to make recommendations where they would only act as refinements of, or variations to, the Stoll/Valentin recommendations.

1.10 I also forecast that I intended to commence a further own motion investigation within six months of my report in order to monitor the ACC's progress in implementing the Stoll/Valentin recommendations, and my own.

1.11 On 8 June 2004, my report of investigation was provided to the ACC, and the Minister for Justice and Customs, Senator the Hon. Chris Ellison, pursuant to section 15(2) of the Ombudsman Act. I also provided a copy of my report to the Chairman of the Parliamentary Joint Committee on the ACC, the Hon. Mr Bruce Baird MP, under section 35A of the Ombudsman Act.

1.12 The CEO of the ACC advised me in his response to my draft report of 25 June 2004, provided to him under section 8(5) of the Ombudsman Act, that he accepted the Stoll/Valentin recommendations and my own recommendations.

1.13 I also received updates from the ACC regarding its implementation of the Stoll/Valentin recommendations and my recommendations on 2 July 2004, 19 July 2004 and 12 October 2004. Additional conversations between Mr Milroy and myself lead to an in-principle agreement that my investigation to review the implementation of the recommendations would occur in November 2004.

1.14 On 27 October 2004, I advised Mr Milroy that I intended to conduct an own motion investigation into the implementation of the recommendations, under section 5(1)(b) of the Ombudsman Act, and that my investigation would seek to determine whether the actions taken by the ACC constitute an appropriate and proportional response to the recommendations.

1.15 On 1 November 2004, my investigators conducted an initial briefing with the Executive Officer to the CEO of the ACC, Ms Kim Hudson. That briefing identified the documents that would be initially required for the investigation, and informed the ACC that, should it be necessary, staff of the ACC would be interviewed by the investigators on 2 or 3 November.

1.16 As the information provided to my investigators was of a high standard, and an extensive interview was held with the Director of Corporate Services, Mr Andrew

Phelan, no interviews with other staff were necessary. The cooperation extended to my investigators also removed the requirement for the use of my coercive powers, and no notices under section 9 of the Ombudsman Act were issued in the course of this investigation.

Investigation

The Role of the Ombudsman

2.1 As I stated in my 2003-2004 Annual Report, there are different facets to an Ombudsman's office. Aside from the more characteristic role of responding to individual complaints and inquiries, my office is committed to improving government administration. I have sought, in the first year of my term as Ombudsman, to use the experience my office has gained through complaints management to stimulate improvements across the breadth of government administration.

2.2 This year has also been remarkable for the discussion about the role of Ombudsmen as anti-corruption agencies for law enforcement. A contemporary Ombudsman must be cognisant that complaints can be indicators of possible corrupt activity. Equally, an agency's administrative systems can reduce the opportunities for corrupt behaviour to occur, and assist in the prompt detection of corrupt behaviour.

2.3 However, I do not believe that the Ombudsman should be the chief agency responsible for investigating corruption allegations, and I note the Australian Government's intention to establish an agency that would investigate corruption in law enforcement agencies, including the ACC. This position has influenced me in the course of this investigation.

2.4 I have a particular expertise in matters relating to law enforcement agencies by virtue of my complaints and inspection roles, and I have not conducted this investigation to directly assess the anti-corruption value of the ACC's policies and procedures. Neither have I sought to 'stand in the shoes' of the ACC's managers in articulating solutions for an organisation of which I have little direct operational knowledge.

2.5 Instead, I have drawn on the Stoll/Valentin report, and on my own conclusions, that failures in management and compliance systems of both the former National Crime Authority and the ACC allowed weaknesses in supervision and management to be exploited. These factors did not create corrupt behaviour in two persons who would ordinarily not act in that manner. Instead, it provided an opportunity for any person who was otherwise drawn to engage in corrupt or criminal activities to use their positions in a law enforcement agency to access information, informants and public assets to further their own ends.

2.6 It would be somewhat naive for any oversight agency to believe that had the ACC's policies been more developed, corrupt activity would not have occurred within the organisation. Indeed, the majority of the criminal activity that was alleged to have occurred in this case occurred outside of normal hours of duty, and this would have considerably reduced the ability of the ACC to detect these activities under any circumstances.

2.7 However, administrative misbehaviour may be a thread to corruption. In the absence of effective administration, an environment where corruption is more likely to

succeed can form. Further, administrative misbehaviour, at even a low level, can be an indicator of more significant issues, including corruption, being present. I believe that had more developed management and compliance systems been in place at the ACC, the opportunities for the secondees to act corruptly might have been significantly limited, and more likely to be detected.

Methodology

2.8 The expertise that I have brought to this investigation is that of an external observer, with the special insights that an Ombudsman gains into administrative systems. My investigation consisted of an examination of the documents identified by the ACC as policies, procedures or staff directives that were created or revised in order to respond to the recommendations. A list of the documents reviewed is at **Attachment A**.

2.9 I have not considered it necessary to present an analysis of each action taken by the ACC in response to the Stoll/Valentin recommendations. My previous investigation satisfied me that the Stoll/Valentin review had met its Terms of Reference and was a sufficient response to the issues raised in the allegations of criminal activity. Further, I have no independent knowledge of the policies and procedures examined in the Stoll/Valentin review on which to base any comparison between new and previous policies and procedures.

2.10 I have, however, used examples to illustrate my examination of aspects of the ACC's response to the Stoll/Valentin report and my recommendations. This report considers the ACC's responses to the two specific recommendations made in my previous investigation, and then discusses the actions taken by the ACC in response to the Stoll/Valentin recommendations.

2.11 My investigators developed a matrix of actions that had been taken in relation to the 53 Stoll/Valentin recommendations as shown below:

1.17 Issue	Recommendations
Management of Drug Samples and exhibits	2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12
Management of Human Sources	13, 14, 15, 16
Operational Issues – advance account, letters of assistance, drug purchases and rewards	17, 18, 19, 21, 22, 23, 24
Particular aspects of the secondee's activities	1, 20, 25, 27, 28, 41 , 47
Practices and training, including firearms, overseas deployment, vehicles, hours of duty and personal use of mobile phones	29, 33, 35, 36, 37, 40, 42, 43, 44, 45, 46, 51
Recruitment and management of secondees	30, 31, 32, 34, 38, 50, 52, 53
Information management	26, 48, 49

2.12 Certain recommendations were excluded from this investigation, as I was of the opinion that they required responses that could be taken with a single action by the ACC. I was satisfied that, on the information already provided to me by the ACC, these actions had been taken (recommendations 25, 27, 52 and 53). The relevant recommendations are indicated in bold in the table above.

2.13 I also excluded recommendations that related to the taking of specific law enforcement action or the further investigation of the alleged criminal activities of the secondees (recommendations 28 and 41). These recommendations have also been indicated in bold in the table above.

2.14 I also considered that where the ACC advised me that an action was incomplete, particularly if that action related to the development of a policy, then the investigation should not make an examination of that action. Responses to recommendations 10, 11, 13, 16, and 26, were therefore not examined in detail. These recommendations are marked in italics in the table above. These recommendations relate broadly to the finalisation of the ACC's review of the lodgement of drugs in the AFP's Sydney drug registry, the continuing development of the ACC's Human Source Management Sub-Committee and the ongoing review of the ACC's information management systems. I am satisfied that the management model adopted by the ACC, and discussed later in this report, will provide the same rigour to the finalisation of these issues as in the documents reviewed in this investigation, and do not propose to revisit these issues in the future.

Results

Ombudsman's Recommendation 1

2.15 In my June 2004 report, I recommended that the ACC should "undertake a review of individuals' performance in failing to adhere to prescribed policies, and the existence of practices contrary to policy. This performance review should seek to identify appropriate management responses to the actions of those individuals where those employees are still employees of (or secondees to) the ACC".

2.16 The ACC advised me, in its 12 October 2004 update, that only one of the persons with supervisory or management responsibility for the secondees was still an employee of the ACC. Other supervisors had returned to their 'home' police services or had otherwise 'moved-on'.

ACC Employees

2.17 I was advised that the employee who had supervised the secondees and who remained an employee of the ACC had provided a written response to the ACC about the management practices identified by the Stoll/Valentin review. I have chosen to make no direct comment about these matters in this report, as I am satisfied that the CEO of the ACC is best placed to identify an appropriate management response to any apparent performance deficiencies. However, it may be useful for me to make a general comment about the role of management and supervision in the ACC.

2.18 A workplace culture that is actively distrustful will undermine productivity and morale. Equally, a workplace that is overly trusting can be open to manipulation and dishonesty. It is imperative that a balance is achieved in any workplace to ensure that trust is not 'misplaced'. The development of policies and practices, and the conduct of audits, can be no substitute for specialist knowledge, an awareness of roles and responsibilities, and sound judgement.

2.19 It is therefore important that managers fairly, but critically, view the actions and motivations of their staff. Failure to do so will undermine the effect of the policies that have been developed and reviewed by the ACC.

2.20 Managers should not 'suspend disbelief' when reviewing issues within their workplace. They should be able to demonstrate that they have applied intellectual rigour to understanding their responsibilities, and investigating anomalies in their workplace. Managers should also be aware of the increased likelihood of corrupt or inappropriate behaviour occurring in the workplace when trust is misplaced.

Referrals to Other Police Services

2.21 Where former supervisors or managers of the secondees have returned to seconding police services, the CEO of the ACC wrote to the relevant Commissioner and suggested that some investigation of conduct matters might be warranted. Specific concerns and questions have been provided to the Commissioners by the ACC to assist their investigations. These letters were provided to the Commissioners in early August 2004.

2.22 At the time of my investigation, no responses to these referrals had been received by the ACC. While this is not unreasonable for the investigation of complex matters, I have some concern that time has lapsed with no apparent progress.

2.23 I am aware that the decisions made by the Commissioners, aside from the Commissioner of the AFP, are outside of my jurisdiction, and am somewhat reluctant to make comment about their responses to this particular issue.

2.24 However, I also believe that it would be remiss of me not to use this report, which I am aware will be provided to the Board of the ACC, to signal that the responses of the Commissioners are critical to the resolution of some of the difficulties experienced by the ACC in managing secondees.

2.25 It would be disappointing, and detrimental to the initiatives of the ACC, if attention is not paid to the actions of those managers of the secondees, and performance issues that may have contributed to the failures in the management and compliance systems identified in the Stoll/Valentin report are not acted on.

2.26 I therefore urge the ACC Board to ensure that the relevant areas of their police services respond positively and appropriately to the issues brought to their attention by the ACC, and model the management of performance issues for secondees.

Ombudsman's Recommendation 2

2.27 My second recommendation was that the ACC "should examine opportunities for the development of a formal system of protected professional reporting".

2.28 The ACC advised me in its update of 12 October 2004 that it had reviewed the Australian Federal Police's professional reporting program, but did not consider that it would be cost-effective or add material value to the ACC's Professional Standards and Integrity Management Plan (PS&IMP). The ACC further expressed its opinion that the PS&IMP is a reasonable and appropriate response to the ACC's risk profile and was a more proportionate response for an organisation where 80% of staff members are employees under the *Public Service Act 1999 (Cth)*. I see no reason to

be critical of this response, and note that the management of integrity issues in a public service agency is necessarily different from the management of those issues in a disciplined police service.

2.29 During the investigation, my investigators noted to Mr Phelan their view that the whistleblower policy was expressed at a high level, identifying substantive or serious breaches of, inter alia, the Australian Public Service Code of Conduct as material covered by the policy. A person making a report would also be required to notify a senior staff member and expect to be interviewed about their allegation, suggesting that the policy was not an avenue for anonymous reports.

2.30 My investigators queried the decision to place an implicit onus on the whistleblowing policy as an expression of 'public interest disclosures' rather than as a mechanism by which the organisation could become aware of corrupt or anomalous behaviour.

2.31 The ACC was able to demonstrate to my staff that other complementary policies (the ACC's anti-harassment policy, for example) will provide avenues for staff to report or discuss issue of concerns. I am satisfied that this integrated approach to information gathering will support a culture in which professional reporting is both enabled and encouraged.

Ombudsman Recommendation 3

2.32 My final recommendation to the ACC was that it should "implement all the recommendations made in *A review of the operational and corporate implications arising from the alleged activities of certain police secondees to the former National Crime Authority and Australian Crime Commission during the period 28 February 2000 to 18 February 2004: A report commissioned by the Australian Crime Commission*".

2.33 As I have indicated above, the ACC advised me that it had accepted all recommendations made in this report, and my investigation sought to ascertain if the ACC's responses were appropriate and proportionate. I have not sought to prepare this report as a definitive analysis of each action taken by the ACC in response to the Stoll/Valentin Recommendations.

2.34 I am satisfied that the ACC has prepared policies and procedures that are intended to act as a suite of cross-referenced documents, and provide guidance to all ACC staff and secondees about expected standards of behaviour and performance.

2.35 I note that this suite has been developed in the four months that have elapsed since the finalisation of the Stoll/Valentin report, and my own investigation. I commend the ACC for its commitment not only to developing these documents, but to formulating a strategy to address the issues that have been identified in a short time frame.

2.36 For the purposes of my investigation, and in the interests of brevity, I have not prepared a detailed analysis of each document. Instead, I am satisfied that all policies bar one are direct responses to the recommendations. The policy that is an exception is Vol 4, Part 11, National Operations: *International Liaison*, which was reviewed in light of recommendation 35 of the Stoll/Valentin report.

2.37 This recommendation was that the ACC consult other agencies with a view to having a 'pre-deployment' package of information and instructions ready for use should a long-term international deployment be required. The policy that has been developed by the ACC provides detailed information about issues of international liaison, including extradition, the exchange of information, and the management of relationships with foreign law enforcement agencies.

2.38 In updates received from the ACC, and in the course of this investigation, my investigators were advised that the ACC had reviewed the circumstances leading to the deployment of secondee 2, and the issues that arose during that deployment.

2.39 The ACC expressed its view that the most appropriate response to the issues resulting from secondee 2's deployment was to prepare a policy for overseas matters generally. That policy has some discussion of the human resource issues that would arise. This is not an exclusive focus however, as the ACC has advised me that there is no evidence of supervisory shortcomings in its supervision of secondee 2's deployment.

Process for the Development or Review of Policies

2.40 My investigators reviewed available documents underpinning the development or review of policies to ascertain if the review or decision-making process was robust. I am of the opinion that the ACC has expended significant intellectual effort in its response to the recommendations.

2.41 An example of a robust approach was identified in the internal committee discussions about the non-evidentiary or sample purchase of drugs. The Committee clearly considered the issue from a legal, operational and accountability perspective. Opposing views were ventilated and reported to the Governance Operations Committee (GOC) in the Committee Report on *Sample and Non Evidentiary Drug Purchases*. The GOC formed a final view on the issue in policy *Vol 4, Part 17, Operations: Covert Purchase of Illicit Goods*.

2.42 I am satisfied that the process of making recommendations regarding the new policy to the GOC represented an appropriate and proportionate response to the need to review and develop policies. I have no reason to believe that any other policies were developed or reviewed with less rigour.

Development of a Policy Suite

2.43 The ACC advised my investigators that it was seeking to develop an integrated framework for professional conduct and integrity. A core element of the framework is the development of a suite of policies, which would act to mainstream aspects of risk management and create a positive framework to encourage a professional organisation.

2.44 An example of cross referencing of policies to create an integrated suite was seen in policy *Vol 4, Part 1, National Operations: Partnerships, multi-disciplinary schemes, task forces, joint investigations, cooperative efforts*. This policy integrates with policies about:

- Management and supervision of seconded police investigators and contracted ACC investigators (Vol 4: Part 2);
- Human source operations (Vol 4: Part 3);
- Surveillance (Vol 4: Part 4);

- Operational security and counter intelligence (Vol 4: Part 6);
- Listening devices (Vol 4: Part 7);
- Telecommunication Interceptions (Vol 4: Part 8);
- Witness Protection (Vol 4: Part 11); and
- Controlled Operations (Vol 4: Part 12).

2.45 I consider that this is an appropriate response to identification of management and compliance systems failures in detecting, discouraging or minimising the alleged criminal activities of the secondees. I am also of the opinion that an anti-corruption policy could have no intrinsic value in the absence of a considered approach to all elements of good administration and conduct, within the ACC or any other government agency.

Conclusions

3.1 The ACC has advised me that it has developed policies and programs to promote the concepts of professionalism and integrity as its primary corruption risk management strategy. This approach is intended to make all staff of the ACC aware of their responsibilities. The policies are supported by an organisational approach that relies on its managers to model professional leadership and an audit regime to assess compliance.

3.2 I am satisfied that policy development has occurred to embed anti-corruption measures and messages within the full suite of ACC policies, rather than present these messages overtly or as a 'stand alone message'. The ACC's Director of Corporate Services was able to provide an overview of a complex and multifaceted approach to assessing the ACC's corruption risk, and address the areas of compliance and management system failure.

3.3 This approach is also intended to preserve staff morale and confidence in the organisation, and to ensure that an appropriate level of trust is present in the workplace. For the reasons I discussed earlier in this report, I believe that using strategies to ensure that managers do not suspend disbelief, and that trust is not misplaced, is a vital element of a successful anti-corruption and integrity framework.

3.4 I have therefore formed the opinion that the actions taken by the ACC are appropriate and proportional responses to the Stoll/Valentin review recommendations and my own. I have decided that further investigation of the ACC's implementation of the recommendations by my office is not warranted, and that the ACC's internal accountability mechanisms, its reports to the ACC Board, and its interactions with the Parliamentary Joint Committee on the ACC will ensure that the ACC continues to develop its integrity framework. I also note that my continuing role to investigate complaints about the ACC will continue to add to the existing accountability and oversight mechanisms for the ACC.

Attachment A: Documents and policies reviewed

Vol 3: Part 2, Intelligence: Management of Covert Human Intelligence Sources

Vol 4: Part 1, National Operations: Partnerships, Multi-disciplinary Schemes, Task Forces, Joint Investigations, Cooperative Efforts

Vol 4: Part 2, National Operations: Management and Supervision of Seconded Police Investigators and ACC Contract Investigators

Vol 4: Part 6, National Operations: Operational Security and Counter Intelligence

Vol 4: Part 11, National Operations: International Liaison

Vol 4: Part 12, Operations: Controlled Operations

Vol 4: Part 15, National Operations: Letters of Assistance

Vol 4: Part 16, Corporate Services: Exhibits Management

Committee Report on Sample and Non Evidentiary Drug Purchases

Vol 4: Part 17, Operations: Covert Purchase of Illicit Goods

Vol 5: Part 3, Corporate Services: Operational cash advances- Special Operational Advances

Vol 5: Part 4, Corporate Services: Possession, Use, and Security of Firearms and Ammunition

ACC Fleet Policy Aide Memoir

Vol 5, ACC Fleet Policy

Professional Standards and Integrity Framework

Whistleblowing Procedures and Guidelines

Minute to Operational and Legal Staff Re:

- *Handling and Lodgement of Drugs;*
- *Obtaining cash advances from a partner agency;*
- *Approaches to another agency to pay a reward for informants;*
- *Letters of assistance;*
- *Operations advance account; and*
- *Diaries and notebooks.*

Information Management Plan and Information and Communications Technology Blueprint (2004-2007)