

28 April 2011

The Hon. Mary Wooldridge
Minister for Mental Health, Women's Affairs
and Community Services
Department of Human Services
Level 22, 50 Lonsdale Street
MELBOURNE VIC 3000

Dear Minister,

Protective Services Officers

The undersigned organisations are writing to express significant concerns about the proposed introduction of Protective Services Officers (PSOs) to both Melbourne metropolitan and major regional railway stations.

We do not support the deployment of PSOs on train stations and are particularly concerned that there has not been adequate consultation about the proposed role of the PSOs, the training they will receive at recruitment, the extent and nature of ongoing 'on the job' training, and what accountability mechanisms will be used to monitor the use of their powers. We urge the Victorian Government to, at a minimum, delay the introduction of PSOs until these critical issues have been addressed.

We are particularly concerned about the potential for negative interactions between PSOs and the vulnerable groups in the community which we work with including young people, people with mental health issues, people with drug and alcohol issue, Indigenous communities and culturally and linguistically diverse groups. Given many of the issues experienced by these groups fall within your portfolio, we are writing to inform you about our concerns and ask that you raise these with your Cabinet colleagues.

These groups are regular users of public transport and already experience over-policing in their use of public space. We are concerned about the potential for the excessive use of force and the escalation of non-violent situations into violent ones unless PSOs are provided with extensive and specific training about how to appropriately engage with these groups.

We hold concerns about the limited training that PSOs will receive in comparison to the significant powers they will be given and considering the potentially volatile situations they may face. We understand that PSOs will be able to make arrests and will be armed with semi-automatic firearms, capsicum sprays and batons. The officers may also be given powers to seize weapons and search offenders, including minors.

Much of the recent media attention has focused on the eight weeks of training that PSOs will receive and the Government maintains that the content of the training,

including weapons handling, will be the same as that provided to police. However, this misrepresents the nature and extent of police training.

Police undergo 23 weeks of training across a wide range of areas including weapons training, communications, ethics and community engagement. This is followed by ten weeks' on-the-job training and then again by regular and ongoing professional development.

Although police officers undergo this level of training, there are still long standing and ongoing concerns about police interactions with vulnerable groups and the use of excessive force. For example, the Herald Sun (18 April) reports hundreds of substantiated complaints against police for behaviours that include 'making threats, indecent behaviour, abuse, being aggressive, insulting, harassing and behaving improperly.'¹ This highlights the inadequacy of eight weeks training for PSOs given their extensive powers.

The Victorian Ombudsman's *Investigation into the Issuing of Infringement Notices to Public Transport Users*, published in December 2010, highlighted the use of excessive force employed by some Authorised Officers on or around public transport infrastructure. The Ombudsman's report noted that some Officers, who have a number of quasi police powers, are not aware of the appropriate use of their powers, and so use excessive rather than reasonable force. Authorised Officers receive six weeks of training, comparable to that proposed for PSOs. This again highlights the potential for a misuse of force given the limited training.

We reiterate that we do not support the deployment of PSOs. The *Police Regulation Amendment (Protective Services Officers) Act 2011* amends the *Police Regulation Act 1958* to make provision for the appointment of additional Protective Services Officers to perform further functions. Given the Act does not specify the role of the proposed PSOs on train stations, the Government has an opportunity to reconsider its pre-election commitment and reconceptualise the roles of the PSOs.

Increased staffing of stations, particularly those where most assaults occur according to police statistics, better use of transit police patrols and physical upgrades to train stations would be more cost effective, better respond to community concerns about safety on public transport and provide broader benefits to the community.

If the Government does proceed with the introduction of PSOs on train stations, there must be greater consideration given to the length and type of training these PSOs receive. At a minimum, the training should be equivalent to that of other operational police and must include specific training about the issues and needs of marginalised and vulnerable groups such as young people, people with mental health and drug and alcohol issues, Indigenous communities and people experiencing homelessness (some of these issues were highlighted at the Tyler Cassidy inquest). Accountability measures must also be considered to ensure regular reporting on the deployment of PSOs to an independent public body such as the Victorian Equal Opportunity and Human Rights Commission.

We look forward to the opportunity to work with you on this issue, and would welcome meeting with you to discuss these concerns further.

¹ Peter Mickelborough 'Rogue police are being caught breaking the law at a rate of more than one a week' Herald Sun, 18/4/11. <http://www.heraldsun.com.au/news/more-news/rats-in-ranks-caught-committing-crimes/story-fn7x8me2-1226040666734>

Yours Sincerely,



Cath Smith
Chief Executive Officer
Victorian Council of Social Service
(VCOSS)



Georgie Ferrari
Chief Executive Officer
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(YACVic)



Ariel Couchman
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