Thursday 2 April 2015

Chief Statistician
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Re: Crime Statistics (Fees and Charges) Regulation 2015

Introduction

We welcome the opportunity to provide comment on the Victorian Crime Statistics (Fees and Charges) Regulation 2015.

The Drug Policy Modelling Program (DPMP) at the National Drug and Alcohol Research Centre, UNSW Australia is a dedicated drug and alcohol policy research and practice program that is committed to improving Australian drug and alcohol policy. It addresses drug and alcohol policy research in the following areas: (1) Building an evidence base to improve policy decision making; (2) Translating research into information of relevance and utility for decision makers; (3) Studying policy processes.

We applaud the establishment of the Victorian Crime Statistics Agency and the commitment by the Victorian Government to "independently publish crime statistics to assist law enforcement police and improve public access to this data" (Victorian Department of Treasury and Finance, 2014). Crime statistics are important to public policy and history has shown that making them accessible and usable through external agencies such as the NSW Bureau of Crime Statistics and Research (BOCSAR) can significantly improve public engagement and evidence-informed public policy (see for example Clancey, 2010-2011).

But we have a number of concerns about the Crime Statistics Agency's draft regulation, Crime Statistics (Fees and Charges) Regulation 2015 (Crime Statistics Agency, 2015b), and broader implications that this raise for the capacity of agencies such as ourselves to analyse Victorian and Australian trends in drug and alcohol offending, evaluate polices or contribute to informed debate. We highlight these issues herein.

Proposal for cost-recovery crime data
We note that agencies such as the NSW Bureau of Crime Statistics and Research (BOCSAR) and the Australian Bureau of Statistics (ABS) use cost-recovery as one method for accessing data. In general DPMP are therefore not opposed to the proposal to provide customised statistical consultancy services as one method for accessing crime statistics in Victoria. However, our support is contingent on two factors: first, that the costs are not obscene and second, that the minimum amount of data provided to the public for free can enable meaningful analysis of crime trends (and therefore not place undue demands on agencies to pay for cost-recovery data).

In this manner we are pleased to note that the Victorian Crime Statistics Agency (CSA) has proposed three channels for release of crime statistics data: 1) public release of crime statistics on the CSA's website; 2) collaborative partnerships with other entities; and 3) customised data consultancies on a cost-recovered basis and that customised data consultancies are not intended to be the primary data source. That said we have serious concerns about the sufficiency of the proposed routine crime data provided through the free channels.

Sufficiency of access to crime data through the Victorian CSA
Public release of crime statistics
The free and main data source is vital for ongoing analyses of crime trends and policies. However, the data on drug and alcohol offending are aggregated to a very high level. For example, the CSA crime statistics (released on 19 March 2015) (Crime Statistics Agency, 2015a) are limited to 1) the overall number of drug offences and 2) the number of drug offences for four offence categories: a) dealing/trafficking; b) manufacture/cultivation; c) use/ possession; and d) other. Importantly, there is no breakdown for any drug type (e.g. for methamphetamine, cocaine or heroin) nor for offence seriousness (e.g. low versus high level drug-trafficking offences).

This is a much higher level of aggregation than was previously available to the public through Victoria Police. For example, the Victoria Police annual crime statistics report differentiated drug offences across six major drug types (cannabis, ATS, cocaine, ecstasy, heroin and other) (see for example Victoria Police, 2014a) and their excel databases further differentiated other drug types and multiple indices of offence seriousness (including whether offences involved traffickable, commercial or large commercial quantities of illicit drugs) (Victoria Police, 2014b). The level of routine data provided by CSA is also much lower than that provided through other agencies such as BOCSAR.

Implication: The routine crime statistics data that is made publicly and freely available by the CSA is insufficient for analyses of drug and alcohol trends or evaluating drug and alcohol policy interventions.

Collaborative partnerships
The second major data source, collaborative partnerships, does offer the potential for obtaining more disaggregated data on drug offending and other activity. Moreover, DPMP are very happy to collaborate with the CSA on topics of concern e.g. specific evaluations of policies or programs. However, it is not practical to collaborate on many ongoing routine inquiries. For example DPMP and other research centres are commonly called on by policy makers, media or other stakeholders to comment on Australian or state-wide drug trends in Australia or the efficacy of drug and alcohol policy responses. We are also called on to make submissions into inquiries, including whether methamphetamine use or supply trends are increasing. This demands swift access to data.

Implication: Collaborative partnerships with CSA for accessing crime statistics are not possible for much of what we and other centres do.

<u>Customised data consultancies</u>
This final data source offered, customised data consultancies, may provide the necessary data for the analyses required by centres such as DPMP. But by definition this cost funds. As with most research centres DPMP also does not have easy funds to access such data, particularly not to access the level of data required for routine data inquiries.

We also note that while agencies such as the NSW Bureau of Crime Statistics and Research employ a cost-recovery model for some crime statistics we also note that the minimum amount of data provided to the public for free is substantially higher. For example BOCSAR provides data on drug offences across multiple offence types (use/possession, trafficking, cultivating, manufacturing, importing), drug types (cocaine, narcotics, amphetamine, ecstasy, cannabis, other) and regions (state, LGA, suburb or postcode) (see for example Goh & Holmes, 2014; NSW Bureau of Crime Statistics and Research, 2015). This significantly reduces the necessity of stakeholders relying upon customised and paid data consultancies.

<u>Implication:</u> Customised data consultancies appear to be the main route that disaggregated data required for much of our analyses is available. However, this is not affordable if it is cost-recovered.

In summary, the level of routine and freely available crime statistics is insufficient as the free and routine crime statistics that is available in the public domain in Victoria will not be suitable for us or many other centres and collaborative partnerships are often not possible for much of the data analysis and policy commentary that we do. This means that there will be a high demand on our requiring customised data requests: for cost. Both the low level of free access to detailed data on drug offending and proposal that all additional data requests be cost-recovered is we deem inconsistent with the commitment to improve public access to crime statistics data in Victoria.

Importance of routine and freely available crime data
Monitoring crime trends and evaluating policy interventions pertaining to drug and alcohol offending demands specificity and highly technical research skills. For example, analyses necessitate distinguishing whether trends are specific to one drug or to multiple, whether trends reflect shifts in policy versus shifts in drug supply and/or demand, and whether they are localised or broad (see for example Babor et al., 2010; Hughes, Chalmers, Bright, Matthew-Simmons, & Sindicich, 2012; Kilmer, Pacula, Hunt, & Rabinovich, 2010). It also necessitates a high level of disaggregation so that the level of aggregation can be tailored to the research question at hand. The failure to obtain such detailed information can lead to erroneous conclusions and/or policy advice, such as concluding that there has been a change in demand instead of a change in policing.

The need for free and disaggregated data on drug offending carries is particularly pertinent in the face of ongoing attention within Victoria and nationally about the issue of methamphetamine use and trafficking. This issue has been identified by the Victorian Parliament (Law Reform Drugs and Crime Prevention Committee, 2014), Victorian Government (Victorian Government, 2015a, 2015b) and by Police Commissioners across the country as one of the two biggest priority issues (ADASC, 2015) and a large amount of new money continues to be rolled out (Hughes, 2015). However there remain many complex and unresolved dilemmas: such as whether and to what extent methamphetamine use trends are increasing, causal mechanisms for any change and whether new policy initiatives such as the new Victorian Ice Plan (Victorian Government, 2015a), which include a broad array of policy responses, can or are likely to reduce drug and drug-related crime. [1]

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[1] Current aggregated data may well mask trends within and between different drug types; including a reduction in one drug but increase in another.

More generally public access is required to increase the capacity to hold agencies, including police and government, to account (Victorian Ombudsmen, 2011). Finally, free public access is required as research funding is poor and increasingly competitive.

DPMP therefore urge expansion of the minimum level of detail provided in the publicly available data on drug offences, to at a minimum include the breakdown of drug types (cannabis, methamphetamine, ecstasy, cocaine, heroin and other). We further recommend that that one of the routine breakdowns of offence location include licensed premise and that the major offence types, including drug offences, at a higher level of disaggregation: namely by LGA/postcode. We further urge that a cost-recovery model be employed as a last resort.

Summary
In summary, DPMP applaud the establishment of the Victorian Crime Statistics Agency and the commitment by the Victorian Government to independently publish crime statistics to improve public access to these data. But we are concerned about the proposal for a cost-recovery model, because the routine free data sources on drug offending are insufficient for monitoring drug and alcohol related crime trends or feeding into ongoing policy debates.

Instead, DPMP urge expansion of the minimum level of detail provided in the publicly available data on drug offences, to at a minimum include the breakdown of drug types (cannabis, methamphetamine, ecstasy, cocaine, heroin and other). We further urge that a cost-recovered model be employed as a last resort: and instead that the majority of data be free and widely accessible, paid for using public money. This is essential to ensure that the new CSA can improve public access to crime statistics, and contribute to the improvement of public policy on issues such as alcohol and drug offending.

Sincerely,

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References

ADASC. (2015). *Police Commissioner's Panel.* Paper presented at the 7th Australasian Drug and Alcohol Strategy Conference, Brisbane.

Babor, T., Caulkins, J., Edwards, G., Fischer, B., Foxcroft, D., Humphreys, K., . . . Strang, J. (2010). *Drug Policy and the Public Good.* Oxford: Oxford University Press.

Clancey, G. (2010-2011). Are We Still Flying Blind - Crime Data and Local Crime Prevention in New South Wales. *Current Issues Crim. Just, 491*, 491 to 500.

Crime Statistics Agency. (2015a). Crime Statistics Victoria, Year ending 31 December 2014 Melbourne: Crime Statistics Agency.

Crime Statistics Agency. (2015b). *Regulatory Impact Statement: Crime Statistics (Fees and Charges) Regulations 2015.* Melbourne: Department of Justice & Regulation.

Goh, D., & Holmes, J. (2014). New South Wales Recorded Crime Statistics 2013. Sydney: NSW Bureau of Crime Statistics and Research.

Hughes, C. (2015). The Australian (illicit) drug policy timeline: 1985-2015. from Drug Policy Modelling Program, NDARC, UNSW https://ndarc.med.unsw.edu.au/resource/australian-illicit-drug-policy-timeline-1985-2014-national

Hughes, C. E., Chalmers, J., Bright, D., Matthew-Simmons, F., & Sindicich, N. (2012). Examining supply changes in Australia's cocaine market. *Drug and Alcohol Review, 31*(3), 263-272.

Kilmer, B., Pacula, R. L., Hunt, P., & Rabinovich, L. (2010). Indicators for understanding supply-reduction efforts. In B. Kilmer & S. Hoorens (Eds.), *Understanding illicit drug markets, supply-reduction efforts, and drug-related crime in the EU* (pp. 45-82). Santa Monica: RAND.

Law Reform Drugs and Crime Prevention Committee. (2014). Inquiry into the Supply and Use of Methamphetamines, particularly 'Ice', in Victoria — Final Report. Melbourne: Parliament of Victoria.

NSW Bureau of Crime Statistics and Research. (2015). Online crime tool. http://crimetool.bocsar.nsw.gov.au/bocsar/

Victoria Police. (2014a). Crime Statistics Official Release 2013/14. Melbourne: Victoria Police.

Victoria Police. (2014b). *Offences Recorded by Offence Code 10 Financial Years.* Melbourne: Victoria Police Retrieved from http://www.police.vic.gov.au/content.asp?a=internetBridgingPage&Media_ID=84496.

Victorian Department of Treasury and Finance. (2014). *2013-14 Victorian Budget, Building for Growth: Service Delivery Budget Paper 3, pp. 33.* Melbourne: Retrieved from http://www.dtf.vic.gov.au/State-Budget/2013-14-State-Budget/Service-Delivery.

Victorian Government. (2015a). Ice Action Plan. Melbourne: Victoria Government.

Victorian Government. (2015b). *The Victorian Government's response to the Parliamentary Inquiry into the supply and use of methamphetamines, particularly ice, in Victoria.* Parliament of Victoria Retrieved from http://www.parliament.vic.gov.au/images/stories/LRDCPC/Ice_Inquiry/Government_response.pdf.

Victorian Ombudsmen. (2011). Investigation into an allegation about Victoria Police crime statistics. Melbourne: Victorian Ombudsmen.