



Civil Liberties Australia Inc. A04043

Box 7438 Fisher ACT 2611

Email: secretary@cla.asn.au

Submission from: Civil Liberties Australia

To: Members of the Economic Policy Scrutiny Committee

Re: **Firearms Legislation Amendment Bill 2019**

Members of Parliament may well consider that this Bill is fundamentally flawed.

Civil Liberties Australia believes it should be rejected by the Committee, and by the Parliament, and sent back for re-drafting so that magistrates and judges are authorized to make the decisions which this Bill seeks to give to the NT Police Commissioner.

The core problem is that the Bill, as proposed, sets out to give judicial powers (even beyond those normally given to a judge or magistrate) to a police officer, specifically to ban people on the basis of a personal say-so, without evidence.

From that tilted beginning, the provisions of the Bill rapidly deteriorate into an assault on civil liberties and human rights. This assault is so deep and so broad that the Bill's own Statement of Compatibility with Human Rights acknowledges that the Bill contravenes:

- Right to liberty of movement and freedom to choose his residence, contained in Article 12 of the International Covenant on Civil and Political Rights (ICCPR);
- Equality before the law, contained in Article 14 of the ICCPR;
- Privacy and reputation, contained in Article 17 of the ICCPR;
- Freedom of association, contained in Article 22 of the ICCPR;
- Best interests of the child, contained in Article 3 of the Convention on the Rights of the Child (CRC);
- Freedom of association, contained in Article 15 of the CRC; and
- Privacy and reputation, contained in Article 16 of the CRC.

It is suggested that no Parliament, let alone an Australian Parliament, should pass a Bill which so assaults rights and liberties.

Apart from the basic problem of giving judicial power to police, the Bill has another core flaw. All "judicial/police" decisions under it are to be an evidence-free zone.

While administering judicial functions, police officers – notably the Police Commissioner, but officers at station level also – are to be permitted to do so based on suspicion and based on “criminal intelligence” at best, and even worse, “criminal information”, if the Statement of Compatibility with Human Rights is to be believed (see below).

Civil Liberties Australia has long had problems with what police and security agencies describe as “criminal intelligence”. It is a double misnomer: it is usually not from criminals, and it frequently falls light years short of what the lay person understands by the word “intelligence”.

In fact, when requested by an Australian Parliamentary Committee in 2012, CLA defined criminal intelligence as:

Senator Nash asked for a definition of “intelligence” or, in the context of the discussion at the time “criminal intelligence”. Civil Liberties Australia had already provided its definition of “intelligence” – from a subsequent web search, it would appear the CLA definition is the best available anywhere in the world. We repeat it here:

What is intelligence? Firstly, it is not evidence...if it were, it would be called evidence.

Intelligence is a broad sweep of guess, speculation, scuttlebutt, gossip, suspicion, hypothesis... A centralized database of intelligence is a most dangerous tool to the innocent and those not part of the power elite of the nation.

– supplementary submission, provided to the Inquiry into the gathering and use of criminal intelligence, Parliamentary Joint Committee on Law Enforcement (PJCLE), original submission by Civil Liberties Australia (CLA): 9 August 2012

(Please see appendix for definitions from other sources)

There is a further inherent flaw in the Bill, which requires correction. Actions under the Bill are to be solely based on “criminal intelligence” as defined in the Bill. However, we would like to bring to the Committee’s attention that the definition of criminal intelligence in the Bill is hard to understand, and does not appear to be fit for purpose.

Clause 4. Definitions

Adds the definition of ***criminal intelligence*** as information the Commissioner classifies as criminal intelligence under the *Serious Crime Control Act 2009*.

The definition under that Act says:

Serious Crime Control Act 2009

Classified ... information means ... information the Commissioner classifies as criminal intelligence.

Criminal intelligence means:

- (a) information relating to actual or suspected criminal activity (whether in the Territory or elsewhere) the disclosure of which could reasonably be expected to:
 - (i) prejudice a criminal investigation; or
 - (ii) enable the discovery of the existence or identity of a confidential source of information relevant to law enforcement; or
 - (iii) endanger a person's life or physical safety; or
- (b) information the disclosure of which could reasonably be expected to reveal and prejudice the effectiveness of any of the following:
 - (i) police information-gathering or surveillance methods;
 - (ii) police procedures for preventing, detecting, investigating or dealing with matters arising out of breaches or evasions of the law.

At the very least, this Bill should not proceed until a proper, workable, understandable definition of “criminal intelligence” is provided. We believe NT Police themselves, NTCAT and any lawyers involved in cases under the proposed legislation would find the basic definition referenced as virtually useless because it is unintelligible.

Comments on Explanatory Statement and individual clauses:

We would like to comment on some individual clauses in the Bill, as outlined in the Explanatory Statement:

New section 49H provides that a firearm prohibition order served on an adult will remain in force for 10 years (and you can't appeal to NTCAT until 5 years pass). A firearm prohibition order served on a person under 18 years of age will remain in force for five years.

That is, on the say so of a police officer only, without evidence or appearing before a judicial officer, a person can have a 10-year ban imposed on him/her. If you're under 18, the ban can be 5 years. Such a provision does not meet the normal standard for a right to be treated fairly before the law, or for the right to be judged on demonstrable proof.

New section 49N provides that NTCAT must take steps to maintain the confidentiality of classified information provided to it by the Commissioner. The steps to be taken include receiving evidence and hearing argument in private in absence of the parties to the proceedings, their legal representatives and the public.

This part of the Bill inexplicably restricts the power of a “court,” or strictly speaking a tribunal in this case. The judicial body must bow to the police force. The clause elevates the “Police Commissioner” above the courts of the NT. In many cases, practically, the decision will be taken by a much more junior police officer on local “intelligence”. The clause provides for secret appeals, after an even more secret “conviction” by police officer's say-so without any notice being given of any impending judgement. That is an unacceptable abuse of power.

Clause (5) of section 49N effectively further expands the basis of secret information on which action may be taken by the Police Commissioner (see discussion under 40A below)

New section 49ZB provides that the Ombudsman must review the exercise of powers conferred on police officers under Part 8A and the financial effect of the result of the commission of offences under Part 8A during the first two years of operation of Part 8A. The Ombudsman must give a copy of the report of the review to the Minister as soon as practicable after the two-year period has expired.

There are two concerns with the above clause:

1. the Ombudsman review is a one-off after two years: It should be ongoing, after every five years; and
2. a copy of the report must go to the Minister: CLA believes the Act should state that the report to the Minister must be made public, without redaction or excision, one month after being received by the Minister.

40A Revocation on basis of criminal intelligence

(1) The Commissioner **must** revoke a licence, permit or certificate of registration if the Commissioner is of the opinion, having regard to any criminal intelligence report or **other criminal information the Commissioner holds** about the holder of the licence or permit, the representative for the licence or permit or the person in whose name the firearm is registered, that:

- (a) the holder, representative or person is **a risk to public safety**; and
- (b) the holding of the licence or permit or the registration would be contrary to the public interest.

(2) The Commissioner is not, under this or any other Act or law, required to give reasons for revoking a licence, permit or certificate of registration on the grounds mentioned in subsection (1).

It is a problem that the provision is mandatory. CLA would expect, in any sensible rewrite of this proposed Bill, the revoking power is not given to the Police Commissioner, but instead is exercised by a proper judicial officer (magistrate or judge), and that the judicial officer has discretion. That is, “must” should be changed to “may”.

Secondly, “a risk to public safety” could include someone who is a bad driver, or who has an infectious disease, and probably several other classes of fringe-dwellers. The clause should be “a risk to public safety if permitted to possess/own/use under licence/etc a firearm”.

42. An officer (*senior sergeant or higher*) in charge of a police station, may...

- (1) (c) if the officer believes on reasonable grounds that the holder is suffering from a physical or mental infirmity or incapacity and, as a result of possessing a firearm, may be a danger to the safety of the person or to another person, or to property; or
- (d) after receiving a report under section 101; or
- (e) if the officer believes, on reasonable grounds, that the person has made a statement that is false or misleading in a material particular in the application for the licence, permit or certificate.

CLA points out that this clause imposes a duty on a police officer to make a medical and/or mental health judgement, with judicial impact, without being trained in medicine or in mental health.

A further problem with this clause is that the referenced section 101 – where a police officer in charge of a station may suspend firearm licences – takes effect if a health practitioner “registered under the Health Practitioner National Law” provides a report. CLA notes that the Bill excludes “diagnostic radiographers” as being able to make such a report, but our reading of the relevant Health Act suggests that midwives, acupuncturists, dentists, chiropractors, optometrists, osteopaths, podiatrists for example (and there may be other sub-professions also) may make a report under s101.

Section 93 provides that anyone moving to the NT may notify in advance in relation to a firearm’s licence they hold if it is to be permitted to stay in force, temporarily. (And it stays in force only 2 days!)

This is simply impractical: how are people to know they are obliged to – in advance, while living in another jurisdiction – comply with a law that doesn’t apply to them until they arrive? And basically, they have two days to complete firearms paperwork when they may be trying to settle in to a new job, new house, schooling for their children, finding a doctor, etc, etc. The concept behind this clause, and the time limits, are completely impractical.

Division 2 General

93F No review of certain decisions by Commissioner

Despite any other Act or law of the Territory (including the common law):

- a) no person or body is entitled to investigate, inquire into, review or otherwise call into question a decision of the Commissioner under section 10(8A), 33(3A) or 40A(1); and
- b) no proceedings for an appeal, an injunction, a declaration or an order for prohibition or mandamus are to be brought in relation to a decision of the Commissioner mentioned in paragraph (a).

CLA believes these clauses are excessive, and should be removed, even if (in newly-drafted legislation) the decision is to be taken by a proper judicial officer. Giving a Police Commissioner, or a judicial officer, unreviewable powers is a very dangerous precedent.

101 Report to be made in certain circumstances

A health practitioner or a professional counsellor or social worker who believes on reasonable grounds that, in the interests of public safety, a person is not a fit and proper person to have a firearm in his or her possession or control must report to a police officer the belief and the material facts on which the belief is based.

This appears to impose a burden on these professionals. Will they become the scapegoat so that NT Police can absolve themselves of responsibility and accountability? Note too that it probably includes other professionals, as outlined above, such as: midwives, acupuncturists, dentists, chiropractors, optometrists, osteopaths, podiatrists...and possibly others. Will the NT Parliament and NT Police be undertaking a training program involving all these professionals throughout the NT? Will they be reimbursed for any mandatory report they provide? What is the penalty if they don’t report? Will they be guilty of an offence if someone runs amok (like the “violent man” mentioned below)?

A firearms club or an historical firearms collector's society must provide a report in writing to the Commissioner without delay of any concern held by the club or society that a member is not a fit and proper person to have a firearm in his or her possession or control.

Once again, the NT Parliament imposes duties and decisions on people who are untrained to make such decisions. The same questions apply as listed in 101 above.

33A Permits

(1) The Commissioner must refuse to grant a permit if the Commissioner is of the opinion, having regard to any criminal intelligence report or **other criminal information** the Commissioner holds about the applicant or representative, that:

- (a) the applicant is a risk to public safety; and
- (b) the grant of the permit would be contrary to the public interest.

The Commissioner is not, under this or any other Act or law, required to give reasons for refusing to grant a permit on the grounds mentioned in subsection (3A). ***The Regulations may provide other mandatory or discretionary grounds for refusing to grant a permit.***

Even before the Bill is enacted, the basis for banning, without evidence or giving reason, has been expanded beyond the initial basis to now include “other criminal information”. We have already explained how “criminal intelligence” can cover a host of sins: “other criminal information” would lower the bar even further, and extend it sideways to almost infinity. Yet the Bill expands even on that: under **49N Confidentiality of classified information**, section (5) “classified information” means information the Commissioner of Police classifies as criminal intelligence”.

We believe the Committee and the NT Parliament will find it unacceptable to leave the scope of such grounds, involving 10-year decisions of banning (which include loss of freedom to assemble, associate, etc) to Regulations. If the law is to be expanded in scope in future, it must go back before the Parliament.

It is pertinent to comment on this Bill’s definitional similarities to “Humpty Dumpty said”:

"When *I* use a word," Humpty Dumpty said, in rather a scornful tone, "it means just what I choose it to mean—neither more nor less."

"The question is," said Alice, "whether you *can* make words mean so many different things."

"The question is," said Humpty Dumpty, "which is to be master—that's all."

Alice was too much puzzled to say anything, so after a minute Humpty Dumpty began again. "They've a temper, some of them—particularly verbs, they're the proudest—adjectives you can do anything with, but not verbs—however, *I* can manage the whole lot!

Impenetrability! That's what *I* say!"^[25]

– https://en.wikipedia.org/wiki/Humpty_Dumpty

Under this Bill, Commissioner Humpty Dumpty, head of the NT Police, will be officially empowered by law to define justice: The law will be what he/she says it is; the reasons for banning/revoking will be what he/she says they should be; the decision he/she takes will be right, because no-one can question his/her decisions. And of course, he/she doesn't have to give anyone any evidence, much less proof.

Statement of compatibility with human rights

This Bill is partially incompatible with the human rights and freedoms recognised or declared in the international instruments listed in section 3 of the *Human Rights (Parliamentary Scrutiny) Act 2011* (Cth). Despite partial incompatibility, the Bill is necessary as firearm-related violence is a real and present threat in the Northern Territory and the ability for Police to take preventative action will result in a safer community.

Civil Liberties Australia comments: the Bill is not “partially incompatible” – it is wholly incompatible.

New firearm prohibition order (FPO) scheme.

A FPO is a discretionary order made by the Commissioner of Police (“the Commissioner”) prohibiting an individual from acquiring, having possession of, or using any firearm or firearm-related item. The Commissioner may make an order only if satisfied that it is in the public interest that the person who will be subject to the FPO not acquire or use a firearm or a firearm-related item.

The Commissioner may do so:

- (c) because of the people with whom the person associates, and
- (d) because of “criminal intelligence” or “other criminal information” (commented on above)

Consorting provisions – who one associates with – in law have a long history in Australia of being misused and abused. History shows that, inevitably, it is the Indigenous people who are most affected by such laws, as interpreted by police.

The Statement complains:

The current process for revocation of licences, particularly when based on criminal intelligence holdings, is a lengthy process that cannot be facilitated outside of business hours. It is completely unsuitable for dynamic unfolding situations which require immediate intervention, based on criminal intelligence holdings which are often provided to police at short notice.

CLA says the Parliament could simply solve this problem police have by drafting a new law to make the process quicker. Given modern technology, the process could be almost instant: certainly, in an emergency, CLA would expect the necessary permissions/warrants/approvals could be sourced and signed within minutes.

The necessity for the FPO scheme

Firearm-related violence is a real and present threat in the Northern Territory (NT). On 4 June 2019, a gunman opened fire at multiple locations around Darwin resulting in four deaths and one person being seriously injured. The mass shooting, referred to by police as Operation Moor, is cause for serious concern not only for police but all Territorians. Police submit that based on the gunman's violent background and criminal associations, it is more likely than not that he would have been subject to a FPO had the proposed legislation been in place.

This is a classic historical "If". Given the man's "violent background and criminal associations", the NT Police should be asked why they had not taken action under existing laws, which provide ample opportunity to deal with such people.

Based on one incident, the Parliament would be enacting laws that cover a wide diversity of circumstances having nothing to do with the "violent/criminal man" problem.

Further, it appears that the proposed law would have the greatest impact by providing the NT Police with an excuse if something similar did happen in future. Under the Bill, those who could be blamed include all the medical professionals a person had dealings with, or members of clubs and associations he/she frequented. This Bill would certainly let NT Police abrogate their responsibility for public safety, claiming it was the responsibility of others to report in advance. Yet the NT Police well knew in advance of the "violent/criminal man's" shooting spree that he was violent and criminal and that he was mentally disturbed.

"OMCG members have also demonstrated **a propensity to acquire firearms** in the NT and traffic firearms across jurisdictional borders."

This Bill will do absolutely nothing to change the above reality.

"Other jurisdictions such as Victoria, New South Wales, South Australia and Tasmania have implemented similar schemes to target firearm violence in those states. **These schemes have proven successful with their operation credited with reductions in organised crime related shootings and firearm-related violence.**"

MPs may wish to ask the NT Police for evidence to back up this claim. CLA is unaware that any of the jurisdictions mentioned make such claims.

Human rights implications

This Bill does engage the following rights:

- Right to liberty of movement and freedom to choose his residence, contained in Article 12 of the International Covenant on Civil and Political Rights (ICCPR);
- Equality before the law, contained in Article 14 of the ICCPR;
- Privacy and reputation, contained in Article 17 of the ICCPR;
- Freedom of association, contained in Article 22 of the ICCPR;

- Best interests of the child, contained in Article 3 of the Convention on the Rights of the Child (CRC);
- Freedom of association, contained in Article 15 of the CRC; and
- Privacy and reputation, contained in Article 16 of the CRC.

CLA has already commented that we would find it surprising if any Australian Parliament passed an Act which so comprehensively trashes rights contained in international conventions. For this reason alone, the Bill requires re-writing.

NTCAT must take steps to ensure that any criminal intelligence reports or other criminal information in relation to the applicant or the people with whom the applicant associates are **not made available to the applicant or to the public**. The practical effect of this is that NTCAT will have appropriate access to confidential information in order to conduct an independent review of the Commissioner's decision while still ensuring that any confidential police intelligence remains confidential.

This is simply unacceptable in a civilised society based on the Rule of Law.

Equality before the law

Procedural fairness is an overarching concept that encompasses a bundle of diverse rights. This includes the right to a fair hearing, which requires that, prior to a decision being made that will affect a person's rights or interests, that the person be informed of the case against them and be given an opportunity to be heard. This right will **not be fully** afforded to the kind of administrative decision-making that will be undertaken by the Commissioner.

CLA comments that it won't be afforded at all. Zero, zilch...much less as suggested by the weasel wording of "not fully".

In relation to the review by NTCAT, classified information (information that the Commissioner classifies as criminal intelligence) will not be disclosed to the applicant. The nature of the limitation extends to **preventing full disclosure** to a party of all relevant and admissible evidence necessary to defend their own interests in a hearing, preventing the release of adequate and transparent reasons, providing for the hearing to be conducted in closed sessions in the absence of the party, limiting the ability to cross-examine certain witnesses and precluding the power of NTCAT to stay the operation of a FPO pending a review.

CLA notes the issue is not "preventing full disclosure". In fact, there will be NO disclosure at all. The deeper into this Bill the Statement of Compatibility goes, the more it transgresses the Rule of Law.

The need to protect police investigative techniques and intelligence has been accepted **by courts** as a legitimate and necessary objective justifying limits on the right to a fair hearing.

Yes, and so it should be. But magistrates and judges are the people to make that decision on a case-by-case basis. It is not usual for a Parliament to give blanket exemption to police to affect the lives of people, instantly, for 10 years, without proper evidence – not just “police intelligence” – when they are not permitted even to know one tiny aspect of the reason for their “conviction in advance”, or the case against them.

The limitation is rationally connected to achieving the purpose of maintaining the confidentiality of criminal intelligence, which is **essential to the proper discharge of police functions**.

No. The one thing that is “essential to the proper discharge of police functions” is operating on the basis of hard facts, provable evidence, the Police Act and Regulations, and the Rule of Law. Without them, policing is simply the control of a ‘big brother’ operation by a uniformed force.

There is a complexity to police intelligence which **makes it difficult** to release details or provide summaries to affected parties without compromising that intelligence. Information comes from a variety of agencies (including federal and international sources) and has varying levels of classification and protection requirements regarding access and disclosure. Any inappropriate release of such information may place the community at imminent risk of danger, or impair the Northern Territory Police’s ability to obtain similar intelligence in the future.

This claim – which, like much of the above, has no place in a Statement of Compatibility with Human Rights – is self-serving nonsense. The reality is that the police, apparently, do not wish to have to provide evidential proof in relation to pre-emptive banning of people from having firearms, or when instantly taking them away. If police are permitted to operate in this manner in relation to firearms, it will be a matter of mere years before this become the basis of police action in other areas of policing.

Accordingly, while these **limitations on the right to a fair hearing** during reviews of a FPO before NTCAT may contain an element of unfairness, these limitations would be reasonably and demonstrably justified as NTCAT retains sufficient discretion and powers to alleviate any such unfairness.

This is a nonsense. Under the proposed legislation, NTCAT retains no inherent discretion or powers to alleviate unfairness. Only the President can even question “fairness”, not an ordinary NTCAT member. NTCAT must first make a ruling against a Ministerial direction, before even approaching the question of whether it can alter the basic unfairness of the Bill. The Bill is the very definition of unfair legislation, because it provides for instant judicial action by a police officer without benefit of requiring to disclose evidence or reason.

These restrictions (on Freedom of association) are reasonably justified as the **scope of the right is primarily concerned with protecting freedom of association to pursue lawful interests in formal groups, and its scope does not extend to restrictions on associations between private individuals**. The scheme is intended to target criminal groups.

This is a gross, telling and inaccurate misinterpretation of the right to freedom of association. Such a right belongs to individuals: it does not belong to groups. This Bill

would permit the NT Police to rewrite international human rights law in their own image. NT Police, like police forces throughout Australia and the world, have copious special laws to target criminal motorcycle gangs, including the existing firearms law in the NT.

An individual's associations with known offenders and persons of concern to police are **directly relevant to evaluating a person...**

The restrictions on liberty of movement are far beyond what is balanced and reasonable because, as the Statement of Compatibility itself says, "The above offence provisions may have the effect of interfering with an individual's capacity to move through certain public premises or properties, engage in lawful sporting and community activities..."

There are **no less restrictive means reasonably available** to ensure that the law does not operate unfairly to persons who abide by the law.

This statement is simply not true. There is a wide range of less restrictive ways of curtailing a person's movements. The newly-drafted Bill we propose should list graduated options.

ENDS CLA submission

Appendix:



SUPPLEMENTARY submission...at the request of Senator Nash

Senator Nash asked for a definition of “intelligence” or, in the context of the discussion at the time “criminal intelligence”. Civil Liberties Australia had already provided its definition of “intelligence” – from a subsequent web search, it would appear the CLA definition is the best available anywhere in the world. We repeat it here:

What is intelligence? Firstly, it is not evidence...if it were, it would called evidence.

Intelligence is a broad sweep of guess, speculation, scuttlebutt, gossip, suspicion, hypothesis... A centralized database of intelligence is a most dangerous tool to the innocent and those not part of the power elite of the nation.

We comment further on the above:

The more that “intelligence” – this poor relation of fact – gets circulated, the wishy-washier it is at the edges. The less reliable it is, the more fuzzy it becomes, and the more dangerous that it gets things wrong: wrong person, wrong emphasis, wrong link...leading to potentially severe miscarriages of justice...some that you, me or the victim will never even know about, which is what is most perfidious about this type of “intelligence”, or “criminal intelligence”.

Because it is just “intelligence”, swapped behind the scenes, with no-one able to monitor and check its accuracy, it can do enormous damage without ever being formally “used” in any traceable way. A wink or a nod can do as much damage, if not more, than an adverse formal finding: at least the formal finding can be challenged. The ACC CEO, Mr Lawler, gave an example: banker going into pub/restaurant where crime figures were meeting. ACC would dob in the banker to the bank chief executives/board, simply because the banker happened to enter a building at the same time as a crime meeting was occurring.

CLA believes any secret holdings of information should be subject to audit four times a year by an independent monitoring group of average Australians, which changes annually...and does not include police, security people, and the like.

For further assistance to Senator Nash, the following material from external sources is provided.

In formal terms, probably the truest definition of “intelligence” is provided by Australia’s Defence Intelligence Organisation, in explaining what its intelligence analysts do:

DIO Defence Intelligence Organisation

Role of Intelligence Analysts

Their task is to study and evaluate information from a variety of sources, such as satellite surveillance, foreign newspapers and broadcasts, social media and human contacts. This information can often be incomplete, contradictory and vary widely in terms of reliability.

<http://www.defence.gov.au/dio/general-intelligence.shtml>

– downloaded 5 October 2012

Other definitions which may assist Senator Nash’s understanding include:

Criminal Intelligence is information compiled, analyzed, and/or disseminated in an effort to anticipate, prevent, or monitor criminal activity. [1] [2] [3]

The United States Army Military Police defines criminal intelligence in more detail; **criminal intelligence** is information gathered or collated, analyzed, recorded/reported and disseminated by law enforcement agencies concerning types of **crime**, identified criminals and known or suspected criminal groups.[4]

It is particularly useful when dealing with **organized crime**. Criminal intelligence is developed by using **surveillance**, **informants**, **interrogation**, and **research**, or may be just picked up on the "street" by individual **police** officers.

– Wikipedia: Criminal Intelligence, downloaded 1730 01 Oct 2012

There are many definitions of Criminal Intelligence Analysis in use throughout the world.

The one definition agreed in June 1992 by an international group of twelve European INTERPOL member countries and subsequently adopted by other countries is as follows:

The identification of and provision of insight into the relationship between crime data and other potentially relevant data with a view to police and judicial practice.[5]

5. International Police (INTERPOL) (2010). Retrieved from <http://www.interpol.int/Public/cia/default.asp>

ENDS

CLA Civil Liberties Australia Inc. A04043
Box 7438 Fisher ACT Australia
Email: [secretary \[at\] cla.asn.au](mailto:secretary[at]cla.asn.au)
Web: www.cla.asn.au

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