



**Victoria Police (Fees and Charges) Regulations
2024 – Regulatory Impact Statement**

Department of Justice and Community Safety

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Executive summary

Context

Victoria Police provides policing services in Victoria and plays a pivotal role in maintaining community safety. While Victoria Police primarily operates for the community benefit, it provides a number of services for private or commercial benefits of users. These include services provided at commercial events and festivals, provision of information or services involving a search of police files, providing witness statements or interviews, and other police information services such as processing fingerprints. The Victoria Police (Fees and Charges) Regulations 2014 (the Regulations) authorises the Chief Commissioner of Police to impose charges for such services and prescribes the fees to be charged.

Under the Regulations, charges are imposed for:

- police personnel and resources deployed at sporting, entertainment and other events that are commercial in nature
- personnel deployment for provision of information
- other police information services, including providing a National Police Certificate or fingerprints
- authorising and giving of agency photographs to media organisations.

The Regulations set out the fees and charges in the following three schedules:

- Schedule 1: Charges for personnel
- Schedule 2: Charges for other services
- Schedule 3: Charges for other police information services

Regulation 4 authorises the Chief Commissioner to charge for Victoria Police personnel and resources deployed at sporting, entertainment or any other event, if the event charges the public for admission or participation, the event is commercial in nature or is commercially promoted or sponsored.¹ These personnel and resources include police officers and Victoria Police employees, police animals including dogs and horses, and assets such as police buses, helicopters and motor boats. Regulation 4 also outlines the calculation of time of duty for police personnel and resources deployed at these events and the time intervals at which charges are to be calculated.

Police resources are only deployed for an event where there is a demonstrable operational risk and the risk cannot be reasonably mitigated by the event organiser or where there is an overriding community or government expectation that police will attend the event. Event organisers may also be required to pay the prescribed charges when police resources are not formally requested for the event, but police are then called upon to assist. While the Regulations

¹ Fees may also be charged for police attendance at government sponsored events. While Victoria Police may waive fees, no events, including government sponsored events, are granted an automatic waiver or a reduction in police charges. In order to receive a waiver, event organisers must apply for one.

authorise charging fees for attending events, the Chief Commissioner may use their discretion to waive or reduce fees for police attendance at certain events.

Regulation 5 authorises the Chief Commissioner to impose other charges for services provided by police officers and Victoria Police employees. These services include:

- providing information or services as a defence witness in a criminal proceeding or as a witness for any other party in a civil proceeding
- searching relevant police files and providing information from these files or supervising the examination of the files
- providing information or services in an interview by a member of the public about an incident or accident reported to Victoria Police including a search of files
- providing a sworn affidavit.

The hourly charges for these services are also covered by the fees prescribed in Schedule 1 of the Regulations.

Regulation 6 authorises the Chief Commissioner to impose charges for services provided by Victoria Police personnel in keeping and searching relevant records and supplying information. Schedule 3 of the Regulations lists the range of information services provided by Victoria Police that are subject to cost recovery from the users. These services include:

- services related to the provision of National Police Certificates:
 - name checks for volunteers:
 - name checks for other purposes than volunteering
 - name checks including fingerprints
- ink fingerprints
- crime and fire reports
- subrogation notices
- collision or accident reports.

The Regulations are due to sunset on 24 June 2024. They are required to be reviewed and remade for the continued effectiveness of the fee structure. This Regulatory Impact Statement (RIS) will support the review into the effectiveness of the Regulations and assess the impact of any proposed changes on Victorian businesses and community.

Currently, the Victoria Police Act 2023 (the Act) gives Victoria Police the authority to charge for policing services inside an event venue and for managing traffic entering and leaving an event venue. Amendments to the Act introduced in 2020 and 2022 will come into effect in early 2024 and will give Victoria Police the authority to also charge for policing services outside an event venue (including for the deployment of Protective Services Officers), for which fees are prescribed in the proposed Regulations.

During stakeholder consultation undertaken in preparing this RIS, stakeholders outlined that Victoria Police having the authority to charge for services outside an event venue was a significant concern. Many stakeholders raised questions about how this power would be used in practice and expressed an interest and willingness to work closely with Victoria Police in determining the appropriate use of this power, and so the impact of these legislative amendments is currently uncertain.

Although the Regulations prescribe what resources Victoria Police can charge for, and sets fee amounts, the impact of the legislative amendment will ultimately depend on the extent to which Victoria Police’s policies allow the use of this new authority to charge outside the event venue. Victoria Police have not yet determined how it will exercise this power, but it is reviewing its policies and intends to publish any updated policy regarding this power to coincide with the commencement of the Regulations. As such, the impacts of this legislative amendment have not been analysed in detail in this RIS. Victoria Police also state that stakeholders will be consulted regarding the use of this power, and DJCS and Victoria Police will closely monitor the impacts during the evaluation of the Regulations.

Problem and objectives

Victoria Police is funded to provide benefits to all Victorians. Some services provided by Victoria Police directly benefit commercial operators and individuals, creating the need for these public resources to be deployed for primarily private benefits. It is appropriate for those who create the need for or derive private benefits from additional policing services (such as organising and attending safe and secure events) to bear the costs associated with providing them. This rationale also applies to other services provided by the police for private benefits such as processing ink fingerprints for visa, passport, or immigration purposes, providing national police certificates and providing agency photographs to authorised media organisations. Excessive demand on these services, without cost recovery, could restrict Victoria Police’s ability to service the needs of the general community.

In absence of the Regulations, Victoria Police would not have an avenue to impose charges on commercial event organisers or for providing information services or agency photographs. It is likely that Victoria Police would still provide their services at events as and when necessitated by an event’s risk profile. The costs associated with such attendances will need to be recovered from sources such as Victoria Police’s budget or consolidated revenue instead. Therefore, the community and Victorian taxpayers would bear the cost of police attendance instead of the direct beneficiaries. While police presence at commercial events does provide benefits to the community such as reduced disorderly behaviour and ensuring safety of everyone involved, the key beneficiaries remain the commercial event organisers and event patrons. Funding police resources at commercial events would have a cross-subsidisation effect as the broader community is effectively paying for the benefits that event organisers and event patrons derive from the police.

The overarching objective of the Regulations is to ensure the efficient use of Victoria Police personnel and resources. Specifically, the Regulations seek to ensure that the fees and charges set are:

- fully reflective of costs wherever possible or appropriate
- equitable
- simple

New fees and charges proposed for introduction

Remaking the Regulations provides the opportunity to update the fees and charges listed in the Regulations. Since the introduction of the current Regulations in 2014, Victoria Police’s transport and vehicle options have also changed. Some additions to the police fleet such as rotary helicopters have increased functionality and capacity compared to the helicopters in use in 2013 when the Regulations were last remade, thereby increasing the cost profile of the transportation

fleet. The following charges have been proposed for introduction in the Regulations in Schedules 1 and 2:

- Protective Services Officers
- flight personnel
- four-wheel drive operational vehicles
- utility vehicles
- operational vans
- a new fixed wing aircraft
- three new helicopters
- drones and counter-drones

New charges for electronic fingerprint scanning and for subpoena documents are proposed to be added to Schedule 3.

Options

Recent amendments to the *Victoria Police Act 2013* stipulate that the Regulations may prescribe fees for police services by reference to any one or more of the following:

- the type of police services and goods provided
- flat rates or rates per hour or part of an hour
- the same rate or amount for all members of Victoria Police personnel provided, or different rates or amounts depending on:
 - the rank or grade of members of Victorian Police personnel provided, and
 - whether members of Victoria Police personnel provided would or would not otherwise be on duty
- in the case of police services and goods to be provided that are not ordinarily available within Victoria Police, the costs incurred by the Chief Commissioner in acquiring those police services and goods.

The options analysed in this RIS have been developed taking into account this provision in the Act. These options have been developed such that they align with the objective of cost recovery and the policy objectives discussed above (cost reflective, equitable and simple). The options have been assessed against the Pricing Principles outlined in the Victorian Government's *Pricing for Value* Guide. Three options have been analysed for remaking the Regulations and have been assessed against a base case where the Regulations expire and are not remade. All the options considered include the new fees and charges discussed above. The three options are:

Option 1: Single hourly/part-hourly fee charged for all events and a single fee charged for all police information services

Under this option, a single hourly and part-hourly fee would be proposed for police personnel and services attendance at events. The fee would be based on the average total cost of providing event management services (including personnel and other services) and cover the cost of personnel and police assets.

Similarly, a single fee would be charged for all police information services and Schedule 3 would be replaced by one fee. This fee would be based on the average cost of providing the different types of information services (national police certificates, accident reports, insurance reports, subrogation notices and subpoena management services).

Option 2: Broad categories of fees aligned with risk/activity type

Under this option, fees for events management would be based upon an assessment of whether the event requiring police personnel and other services is considered a low, medium, or high-risk event. Victoria Police undertakes a risk assessment for all events they are requested to attend which includes consideration of the:

- nature of the event, such as alcohol consumption or suspected illicit drug consumption
- anticipated attendance numbers and demographic
- event history or staging of similar events
- knowledge of the event organiser/promoter/venue manager
- liquor licensing factors
- current political, cultural, economic, social, or environmental factors
- intelligence, including attendance of controversial guests
- threat assessment ratings, including terrorism.

This risk assessment would be used to classify the risk profile of an event requiring police presence into a low, medium, or high-risk category. Under this option, the Regulations would prescribe the fees for the three risk categories while the actual classification of events into the categories would be done by Victoria Police upon application by the event organiser.

Similarly, all information services for each item in Schedule 3 would be charged a single fee. Under Schedule 3 there are three types of fees for National Police Certificates, two types of fees for lost, stolen or damaged properties, and two fee types for collision or accident reports (see Appendix A). Under this option, each of these categories will incur a single fee. For instance, the three types of National Police Certificate fees will be consolidated into one fee type.

Option 3: Costs based on line item costs for personnel, resources and effort involved (status quo with amendments)

Under this option, fees would be charged at a more granular, line-item level, as is currently the case (see Appendix A). These fees would be based on the per hour cost of providing personnel (based on salaries) and other police resources for events and provide for variation in costs for delivering the information services.

Analysis

A multi-criteria analysis (MCA) has been used to compare and assess the options described above. The MCA criteria have been developed using Victorian Government’s Pricing Principles. The criteria are shown in Table i below.

Table i: MCA criteria for remaking the Regulations

Criterion	Relevance	Weighting
Criterion 1: Cost reflective	<p>The fees and charges set should reflect the risks posed by the users and the costs to Victoria Police associated with providing the services for which the charges are collected. Full cost recovery accounting for risk promotes the efficient consumption and provision of these services.</p> <p>This criterion is based on Pricing Principles 1, 7 and 8.</p>	33.3%
Criterion 2: Equity	<p>To encourage efficient consumption and provision of policing services, the costs should be borne by those who benefit from or create the need for them. This criterion implicitly aims to avoid cross-subsidisation as far as practicable by attributing the fees and charges directly to those who trigger the need for the service. This criterion also reflects the objective of setting fees and charges at levels that do not limit accessibility or capacity to pay.</p> <p>This criterion is based on Pricing Principles 2 and 5.</p>	33.3%
Criterion 3: Simplicity	<p>The fees and charges should be easy for users to understand and simple for the fee-collecting entity to administer. Where possible, a simple and clear fee schedule can reduce complexity, decreasing the amount of time spent by users in understanding the fees involved.</p> <p>This criterion is based on Pricing Principle 11.</p>	33.3%
Total weighting		100%

Identification of the preferred option

The MCA criteria were used to determine the preferred option for remaking the Regulations. As outlined in Table ii below, each option scored positively compared to the base case.

Table ii: MCA results

Criteria	Weight	Option 1 <i>Single fee charged for all events and for all police information services</i>	Option 2 <i>Broad categories of fees aligned with risk/activity type</i>	Option 3 <i>Costs based on line item costs for personnel, resources and effort involved (Status quo)</i>
Reflective of costs and risks	33.3%	3	5	9
Equity	33.3%	2	4	9
Simplicity	33.3%	-1	-2	-4
Weighted score		1.33	2.33	4.66

The results of the MCA show that Option 3, Costs based on line item costs for personnel, resources and effort involved, is the preferred to both the base case and Options 1 and 2.

Option 3 best balances the objectives of government to recover the costs of providing police services with the need to ensure more equitable and simple fee structures. It is preferable as under the other Options and the base case, there would be an under-recovery or over-recovery of costs from users. Under Option 3, users would be charged according to the level of effort and costs incurred by Victoria Police and assessment of risk can be undertaken on a case-by-case basis, reflecting stakeholder views that risk varies widely between different events (even between events of a similar nature) and can also be influenced by external events close to the date of an event in ways that make stratification of risk by event type likely to be impractical compared to assessing the risk of each event on its merits. Stakeholders expressed an interest in consulting with Victoria Police on how best to assess risk of different events, in the interests of aligning stakeholder perception of risk with the perception of risk by Victoria Police.

The future costs and revenue associated with the preferred options and the level of cost recovery is dependent upon the number of events that are held in Victoria and the extent of the waiver power used. However, using historical data, this RIS provides an illustration of the potential scale of fee revenue over the 10 year life of the proposed Regulations as being an annual average (undiscounted) impact of \$14.4 million (\$9.1 million from fees for personnel and resources deployed to events and \$5.3 million from fees for police information services), with a present value of \$112.9 million (\$76.5 million from fees for personnel and resources deployed to events and \$36.4 million from fees for police information services). The total fees charged for personnel and resources deployed to events may increase as a result of the legislative change

enabling fees to be charged in the area surrounding the venue. The impact of this change has not been estimated as Victoria Police policy and processes (that will determine the use of this power) are currently under development.

In terms of the impact of the proposed fees for events on individual events, it is difficult to estimate the likely impact of the proposed fees on a per-event basis, given the wide variation in the nature of events held in Victoria, the different drivers of risk associated with those events and the corresponding level of police personnel deployed, or the extent to which police vehicles or other resources may be required.

Victoria Police advises that it provides police resourcing at commercial events where there is a demonstrable operational risk or need to ensure public order, and the risk cannot be reasonably mitigated by the event organiser or where there is an overriding community or government expectation that police will attend the event. When planning for an event, Victoria Police considers numerous factors and utilises intelligence to ascertain the level of risk identified – although this is subject to change. While no two events are the same, due to compounding factors including but not limited to current political, cultural, economic, social, or environmental factors, cohort in attendance, location, volume of attendees, there are events that present lower risk than others.

On this basis, Victoria Police has developed illustrative estimates of potential costs of police personnel attendance at events depending on whether Victoria Police’s risk assessment indicates that small, medium or large police presence is required. Using samples of invoices for events with varying levels of attendance by personnel, Victoria Police provided illustrative examples of these different levels of police presence based on hours of officer (e.g. commander, superintendent or inspector), sub-officer (e.g. senior sergeant or sergeant) and other rank (e.g. leading senior constable, senior constable, first constable, constable, recruit or reservist). The below table shows the illustrative estimates of effort and the estimated corresponding cost for an event held in 2023-24 based on both the current fees and the proposed fees.

The illustrative estimates provided by Victoria Police indicate that, across a range of levels of effort, the potential impact on the fees associated with police personnel attending an event would be in the order of 13% for small, medium and large police presences at an event.

Table iii: Illustrative estimates of costs of a small, medium or large police personnel presence at an event based on the current and proposed fees

Level of police effort	Officer hours	Sub-officer hours	Other rank hours	Cost based on current fees	Cost based on proposed fees
Small	0	15	40	\$6,398.50	\$7,213.00
Medium	2	47.5	144.5	\$22,558.50	\$25,394.95
Large	6.5	123	342	\$55,179.70	\$62,272.50

Source: Deloitte Access Economics analysis of Victoria Police data

Small business and competition impacts

According to the requirements in the Victorian Guide to Regulation, the RIS is required to assess the impacts of the remade Regulations on small businesses and competition in Victoria. The preferred option will not have a material impact on competition as the updated fees and charges will apply to all businesses. An increase in police charges for events may pose a barrier to entry for small event organisers. However, the use of the fees and charges in the Regulation is at the Chief Commissioner of Police's discretion. The power to waive fees allows police to exercise discretion in cases where costs may threaten an event's financial viability. Stakeholders consulted noted that depending on the scale of the potential increase of police fees, the additional costs may make it cost-prohibitive for some security license holders to remain in the security industry. For instance, the cost of a National Police Check will increase by 61% (increase of \$31.80 from the current cost of \$52.50) under the proposed Regulations. However, the potential scale of this impact is currently unknown. DJCS welcomes any and all input from stakeholders regarding the extent to which they anticipate the proposed increase in police fees may anticipate their ability to remain in the security industry.

Smaller event organisers could be disproportionately impacted by the increase in fees and charges for police attendance at events. Stakeholders consulted noted that police costs can constitute up to 20 per cent of an event's cost. Therefore, an increase in police fees for events can increase costs significantly for small event organisers. The effect of the increase may be mitigated to a certain extent by Victoria Police's fee waiver policies in instances where police costs can threaten an event's financial viability.

It is acknowledged that, particularly in the context of the legislative amendments coming into effect in early 2024 which will give Victoria Police the authority to charge for policing services outside an event venue, stakeholders are uncertain about the impact that these fees may have on their events. DJCS will monitor the impact of the fees on events (see section 8.1.4), including any disproportionate impacts on small businesses.

Increases in costs for information services such as National Police Certificates may disproportionately impact small businesses as they have relatively fewer resources compared to larger businesses, noting that the increase in the fee is \$31 and is unlikely to pose a substantial increase in costs in general.

Implementation and evaluation

The proposed Regulations will remake the existing Victoria Police (Fees and Charges) Regulations 2014, with the amendments considered in the RIS. Based on the analysis conducted in the RIS, Victoria Police is recommending remaking the Regulations with minor amendments to the fee schedule. Victoria Police will primarily be responsible for implementation of the proposed changes. They will continue to have ongoing engagement with impacted stakeholder groups across Victoria through processes such as updates to the Victoria Police website, media releases, and communications with key representative groups from impacted stakeholders. Monitoring of implementation, including identification and management of implementation risks, will be undertaken by Victoria Police. Victoria Police will also be responsible for enforcing and administering the proposed Regulations. Given the minor amendments to the Regulations, Victoria Police will not be required to alter the use of existing enforcement and compliance systems to enforce the proposed Regulations.

Given the estimated impact of the proposed fees exceeds \$8 million per year, the Guide to Regulation requires a midterm evaluation of the proposed Regulations (3 – 5 years from initial implementation). Victoria Police will monitor the implementation of the proposed Regulations and DJCS will evaluate the proposed Regulations in respect to their overarching objective of recovering, as far as possible, the cost of police personnel deployed to provide the service for which fees are imposed in the Regulations. Victoria Police, through the State Emergencies and Support Command (SESC) will monitor stakeholder feedback and escalate concerns where necessary. To monitor the impacts and effectiveness of the proposed Regulations and address challenges as they arise, SESC will be compiling a monthly report identifying ongoing and future risks, outlining key stakeholder feedback and relevant reports, so that items may be escalated accordingly.

1. Introduction

This chapter introduces the context of this Regulatory Impact Statement (RIS) and provides an outline of the key steps in the RIS process and structure of this report.

1.1 Context

Victoria Police operates under the *Victoria Police Act 2013* (the Act) which defines its role to serve the Victorian community and uphold the law to promote a safe, secure, and orderly society. Police personnel and other resources may sometimes be called upon for private or commercial purposes, such as providing policing services, or responding to callouts, at sporting events or music festivals, or for personal purposes, such as obtaining a National Police Certificate or for processing ink-fingerprints for visa, passport, or immigration purposes. As these services provide direct benefits to the users of those services and/or deployed in response to risk posed by specific events or activities, it is appropriate for the cost incurred to be recovered through fees and charges.

The Victoria Police (Fees and Charges) Regulations 2014 (the Regulations) prescribe fees and charges that may be imposed for the provision of services by police officers and Victoria Police employees. The Regulations are made the Act and are due to sunset on 24 June 2024. The proposed Regulations will seek to revise and remake the current Regulations and implement amendments to the Act made in 2020 and 2022 (see 0).

This RIS will review the effectiveness of the sunseting Regulations and assess the impact of any proposed changes on Victorian businesses and community.

1.2 The RIS process

The key purpose of this RIS is to assess the impact of different options for remaking the sunseting Regulations. The approach to the assessment is as follows:

- 1) **Identification of the problem** – consideration of the nature and extent of the problem that the proposed Regulations aim to address, including the:
 - a. need for government intervention
 - b. risks of non-intervention
 - c. objectives of such intervention.
- 2) **Identification of options to achieve the objectives of the proposed Regulations** – the proposed Regulations and alternative options were developed by the Department of Justice and Community Safety (DJCS) and tested with stakeholders during pre-RIS consultation. The establishment of options allow possible costs and benefits to be examined as part of the stakeholder consultation.
- 3) **Stakeholder consultation** – targeted stakeholder consultation was undertaken by Deloitte and DJCS to gather relevant information on the impact of the existing Regulations, as well as the impact of the proposed Regulations for different stakeholder groups.

- 4) **Assessment of costs and benefits** – consistent with the requirements of the *Victorian Guide to Regulation*, an assessment of the costs and benefits under all options, relative to a reference case (base case) was undertaken.
- 5) **Assessment of the other impacts** – consideration of potential broader impacts of the preferred option on industry.
- 6) **Implementation and evaluation** – in reference to the preferred option, the RIS describes the arrangements and broader considerations for implementation and evaluation.

In addition, relevant to all RIS components is an overriding requirement that the depth of the analysis must be commensurate with the magnitude of the problem and with the size of the potential impact of the proposal.

1.3 The Victorian Government’s Pricing Principles

The Victorian Government’s *Pricing for Value* guide introduces Pricing Principles which decision makers are encouraged to consider when pricing government services. The *Pricing for Value* guide builds upon the Department of Treasury and Finance’s previous Cost Recovery Guidelines, which were underpinned by the key principle of setting fees and charges on a full cost recovery basis for the efficient and equitable use of government resources. Under the *Pricing for Value* framework, cost recovery is one principle among a broader range of 12 Pricing Principles. These include potential scenarios where setting prices of individual regulatory activities at, above, or below the cost of those activities may be warranted (e.g., by setting prices above cost in order to send price signals to regulated parties about the higher risks associated with the activities that they undertake, or by setting prices below cost to avoid creating a barrier to entry or unintended negative consequences).

The 12 Principles are outlined in 0 below. As the Regulations prescribe fees and charges, analysis of their appropriateness is required in line with relevant Pricing Principles.

Table 1.1: Victorian Government’s Pricing Principles

Pricing Principle
Principle 1: Prices should reflect costs
Principle 2: Costs should be recovered from those who benefit from or trigger the need for regulation
Principle 3: Services creating broad benefits for the community should be priced to support efficient consumption
Principle 4: The cost of interagency services should be borne by the user agency
Principle 5: The price of services should not limit access to those with a lower ability to pay
Principle 6: Users should pay for differentiated service based on the value created by the differentiation

Principle 7: The public should share in the value generated by pricing based on user differentiation

Principle 8: Pricing should support positive behaviours

Principle 9: Pricing should ensure sustainable usage of public services and reflect the value of natural resources

Principle 10: Where services are in competition with the private sector, pricing should be relative to market prices

Principle 11: Pricing structures should be easy to understand

Principle 12: Pricing arrangements should be monitored annually and reviewed periodically

Source: Deloitte Access Economics

1.4 Public comment

The proposed Regulations and this RIS will be released via Engage Victoria for a 28-day public comment period to provide event organisers, other interested parties, and members of the public with the opportunity to consider and provide feedback on the proposed Regulations and anticipated impacts as outlined in this RIS.

DJCS will consider all submissions received during public consultation and prepare a formal Response to Public Comment document detailing the submissions received, and DJCS' response.

1.5 The structure of the RIS

Following the *Victorian Guide to Regulation*, the RIS is structured as follows:

- Chapter 2 – Background
- Chapter 3 – Problem statement and objectives
- Chapter 4 – Fee cost base
- Chapter 5 – Options development
- Chapter 6 – Options analysis and preferred options
- Chapter 7 – Impact on competition and small business
- Chapter 8 – Implementation and evaluation
- Appendix A – Current fees prescribed by the Regulations
- Appendix B – Stakeholder consultation summary

2. Background

This chapter provides the background to Victoria's Police's legislative and regulatory framework and details the provisions in the Victoria Police (Fees and Charges) Regulations 2014.

2.1 Victoria Police

Victoria Police is the primary law enforcement agency responsible for policing in Victoria. Its role encompasses various aspects of maintaining law and order, public safety, crime prevention, emergency response and road safety. Under the Act, the general functions of Victoria Police include:

- preserving the peace
- protecting life and property
- preventing the commission of offences
- detecting and apprehending offenders
- helping those in need of assistance.

As of March 2023, Victoria Police has 21,332 Full-Time Equivalent (FTE) employees.² This consists of police officers, protective services officers (PSO), recruits and Victoria Police employees, which includes Victoria Public Service (VPS) employees and protective custody officers.³

2.2 Legislative and regulatory framework governing Victoria Police

2.2.1 Victoria Police Act 2013

The *Victoria Police Act 2013* is the key legislation governing Victoria Police. The 2013 Act repealed the longstanding *Police Regulation Act 1958*, and sought to remake and modernise the law relating to the governance and regulation of Victoria Police.

The Act covers the following:

- the constitution, role and functions of Victoria Police and its relationship with government
- rank structure, commissioned officers, police officers and PSOs, as well as the roles and appointment processes of Victoria Police personnel
- police duties, powers, entitlements, protection, and liability
- drug and alcohol testing
- police registration
- discipline

² Victorian Police (2023), 'Employees by location'. Accessed at <https://www.police.vic.gov.au/sites/default/files/2023-05/Victoria-Police-employee-numbers-March-2023.pdf>

³ PSOs are armed and uniformed officers who operate in designated places and police stations. PSOs operate at railway stations and nearby areas such as car parks, bus stops and taxi ranks and roads used to access train stations. They are deployed at all 217 metropolitan train stations in Melbourne and at Bendigo, Traralgon, Ballarat, and Geelong stations in regional Victoria. In addition to railway stations, PSOs may be called upon to cover major events.

- appeals and reviews
- complaints and investigations
- restorative engagement and redress scheme for current and former members of Victoria Police personnel
- investigation of public interest complaints
- special constables
- police custody officer supervisors and police custody officers
- Police Registration and Services Board
- confidentiality and privilege
- compliance and enforcement.

2.1.1.1 Recent amendments to the Victoria Police Act

Two amendments have been made to the Act in the recent years.

The Police and Emergency Legislation Amendment Act 2020 came into force in December 2020. Its purpose was to amend the *Victoria Police Act 2013* to:

- expand the definition of designated places where PSOs may operate
- expand the functions and powers of PSOs to providing services in an emergency to the general public throughout the whole or a part of Victoria
- include a power to make regulations prescribing fees or charges that may be imposed for the provision of services by PSOs.⁴

The Justice Legislation Amendment (Police and Other Matters) Act 2022 will introduce a number of amendments to the Act. Amendments in relation to fees for policing services will come into effect on 1 January 2024 and include:

- enabling Victoria Police to charge fees for policing services delivered by police officers, PSOs and VPS employees in any area surrounding the venue or event area of sporting, entertainment and commercial events for the purposes of traffic management, the maintenance of good order in the surrounding area or performance of any of the functions of Victoria Police. Currently, Victoria Police are only able to charge for policing services provided inside a venue or event area.⁵
- enabling Victoria Police to enter into agreements with commercial operators for the provision of additional policing services at commercial premises (e.g. shopping centres). The contracts only apply for extra services such as regular patrols through the premises. General policing services such as investigating an incident will not require a contract. Prior to the amendment, Victoria Police only had the authorisation to charge for additional policing services at commercial events.

⁴ The *Police and Emergency Legislation Amendment Act 2020* also made amendments to the *Crimes Act 1958*, *Family Violence Protection Act 2008*, *Sheriff Act 2009*, and the *Fire Rescue Victoria Act 1958*.

⁵ VPS staff are rarely used by Victoria Police for events. While VPS members do not perform policing functions, they work with police members to ensure smooth operations. Victoria Police do not invoice for VPS employees unless specified in the contract. Victoria Police also do not invoice for additional allowances or accommodation for VPS staff.

- enshrining the authority of the Chief Commissioner to refund, reduce or waive charges for police services. This amendment seeks to enshrine in legislation the current waiver policy Victoria Police has in place.

During stakeholder consultation undertaken in preparing this RIS, stakeholders outlined that Victoria Police having the authority to charge for services outside an event venue was a significant concern. Many stakeholders raised questions about how this power would be used in practice and expressed an interest and willingness to work closely with Victoria Police in determining the appropriate use of this power, and so the impact of these legislative amendments is currently uncertain.

Although the Regulations prescribe what resources Victoria Police can charge for, and sets fee amounts, the impact of the legislative amendment will ultimately depend on the extent to which Victoria Police's policies allow the use of this new authority to charge outside the event venue. Victoria Police have not yet determined how it will exercise this power, but it is reviewing its policies and intends to publish any updated policy reading this power to coincide with the commencement of the Regulations. As such, the impacts of this legislative amendment have not been analysed in detail in this RIS. Victoria Police also state that stakeholders will be consulted regarding the use of this power, and DJCS and Victoria Police will closely monitor the impacts during the evaluation of the Regulations.

Similarly, as this RIS is focused on the impacts of the Regulations, rather than previously enacted legislative amendments, this RIS does not analyse in detail the legislative change to enable Victoria Police to enter into agreements with commercial operators for the provision of additional policing services at commercial premises.

Other amendments introduced under this Act which have already commenced are related to:

- the promotion of police officers and PSOs
- the functions, duties, and powers of PSOs
- the powers of police officers and PSOs on and in the vicinity of police premises
- drug and alcohol testing of members of Victoria Police personnel
- disciplinary actions against police officers and PSOs
- restorative engagement and redress for current and former members of Victoria Police who have experienced sex discrimination or sexual harassment
- access, use and disclosure of police information.

2.2.2 Victoria Police (Fees and Charges) Regulations 2014

The Regulations came into effect on 1 July 2014 and are made under Section 277 of the *Victoria Police Act 2013*. The objective of the Regulations is to:

- prescribe the fees and charges that may be imposed for the provision of services by police officers and Victoria Police employees
- prescribe fees for:
 - applications by media organisations for authorisation to be given agency photographs
 - applications by authorised media organisations for the giving of agency photographs.

Under the Regulations, charges are imposed for:

- police personnel and resources deployed at commercial and entertainment events
- personnel deployment for provision of information
- other police information services, including providing a National Police Certificate or fingerprints
- authorising and giving of agency photographs.

Appendix A contains the full list of fees prescribed under the Regulations. The fees and charges are indexed annually for inflation to maintain the value of the fees.

2.2.2.1 Charges for police personnel and resources deployed at commercial and entertainment events

Regulation 4 authorises the Chief Commissioner to charge for Victoria Police personnel and resources deployed at sporting, entertainment or any other event, if the event charges the public for admission or participation, the event is commercial in nature or is commercially promoted or sponsored.⁶ These personnel and resources include police officers and Victoria Police employees, police animals including dogs and horses, and assets such as police buses, helicopters and motor boats. Section 4 of the Regulations also outlines the calculation of time of duty for police personnel and resources deployed at these events and the time intervals at which charges are to be calculated.

Schedules 1 and 2 of the Regulations prescribe the charges for personnel and other services listing the charges for the first hour or part of the first hour, and for every subsequent half hour or part of half hour. Current practice is that charges are only imposed for the times police members are present at the event, in uniform, with appropriate equipment (if required) and available for duty, which often includes a short mandatory planning (or ‘briefing’) period. Victoria Police does not currently charge for travel times to and from events, with this cost currently absorbed internally.

The primary responsibility for event safety rests with event organisers. Police resources are only deployed for an event where there is a demonstrable operational risk and the risk cannot be reasonably mitigated by the event organiser or where there is an overriding community or government expectation that police will attend the event.⁷ Event organisers may also be required to pay the prescribed charges when police resources are not formally requested for the event, but police are then called upon to assist. The Chief Commissioner’s power to impose charges is not contingent upon a request being made. Victoria Police provides event organisers with a quote for police attendance at the event and a cost agreement.⁸ Where an event organiser has not contacted Victoria Police in advance, this process cannot be followed. As such, the Chief Commissioner can exercise discretion to impose a charge. The rationale for charging for police presence even when not requested is to disincentivise event organisers from relying on the police to attend their event as part of an emergency response should something go wrong. This discretion to impose charges can incentivise the event organisers to consider risk mitigation

⁶ As outlined in section 2.2.1.1, amendments to the Act will expand the power for Victoria Police to impose the fees and charges outlined in the Regulations for services provided by police officers outside the venue or area of an event.

⁷ Victoria Police, Victoria Police Manual – Procedures and Guidelines.

⁸ When Victoria Police provides an event organiser with a quote for police services at an event, a formal cost agreement is also provided for both parties to sign.

measures such as organising private security and engaging with Victoria Police early in the planning process.

Event organisers are not charged for a police response to disruptions created by external parties at an event. During the event planning stage, if there is evidence or intelligence to suggest that protest groups may pose a risk to the event, this is an identified safety concern for spectators, patrons, staff and the public which is factored into the deployment planned for the event.

Further, specialist units such as the Public Order Response Team and Mounted Police are considered when determining personnel options for commercial events. In circumstances where the need for these services has not been anticipated and quoted for deployment to the event, and subsequently their services are engaged due to a typical police response to an incident, the event organiser will not be charged. However, if an event organiser does not engage with Victoria Police prior to an event, and police attendance is required due to an incident or other public order concerns at the event, Victoria Police has the discretion to impose a fee. This is because the incident may have been avoided had Victoria Police been engaged in advance, and planning and resourcing would have been obtained in advance.

When approached by event organisers to provide police resources at an event, Victoria Police conducts a risk assessment to determine the need for police attendance. The risk assessment considers risks such as the:

- nature of the event, such as alcohol consumption or suspected illicit drug consumption
- anticipated attendance numbers and demographic
- event history or staging of similar events
- knowledge of the event organiser/promoter/venue manager
- liquor licensing factors
- current political, cultural, economic, social or environmental factors
- intelligence, including attendance of controversial guests
- threat assessment ratings, including terrorism.⁹

Police personnel can be deployed to community areas which require greater assistance despite the terms of any agreement that Victoria Police enters into with a commercial operator. Victoria Police retains the right to withdraw police resources engaged under an agreement if it is determined that police resources are required elsewhere. Instances where police presence is sought by the event organiser before the event takes place, Victoria Police issues a quote indicating the estimated cost of police attendance. An invoice is issued by Victoria Police after the event which charges the event organiser for the actual level of police personnel and resources deployed at the event.

While the Regulations authorise charging fees for attending events, the Chief Commissioner may use their discretion to waive or reduce fees for police attendance at certain events. No events, including government sponsored events, are granted an automatic waiver or a reduction in police charges. In order to receive a waiver, event organisers must apply for one.¹⁰ In instances

⁹ Ibid.

¹⁰ The only exception to this is the Australian International Air Show where Victoria Police provides services without charge due to existing arrangements between the organiser, Victoria Police and other emergency response agencies.

where organisers do not apply for a waiver, they will be required to pay the charges for police attendance. Waivers are considered by Victoria Police in circumstances where the imposition of police charges can threaten the financial viability of the event, there is a risk of the event being staged in another state where police charges are lower or the event organiser has demonstrated a not-for-profit status or the charitable nature of the event in their application.¹¹ An exception would also include force-de-majeure occurrences. Government sponsorship or financial support for the event are factors that can be considered by Victoria Police if demonstrated on a cost waiver application. Where the above factors have not been adequately identified and demonstrated by an event organiser, a waiver application will be denied. On some occasions fees have not been charged in absence of waiver application due to factors such as the cancellation of an event or a waiver being approved via inter-agency agreement.

In 2021-22, Victoria Police were deployed at 236 events and 13 waiver applications (accounting for nearly 5.5 per cent of events attended) were lodged with Victoria Police. Of these, 10 waivers were granted, two were denied while the remaining one application is in progress.¹²

2.2.2.2 Charges for personnel deployment for provision of information

Regulation 5 authorises the Chief Commissioner to impose other charges for services provided by police officers and Victoria Police employees. These services include:

- providing information or services as a defence witness in a criminal proceeding or as a witness for any other party in a civil proceeding
- searching relevant police files and providing information from these files or supervising the examination of the files
- providing information or services in an interview by a member of the public about an incident or accident reported to Victoria Police including a search of files
- providing a sworn affidavit.

The hourly charges for these services are also covered by the fees prescribed in Schedule 1 of the Regulations.

2.2.2.3 Charges for other police information services

Regulation 6 authorises the Chief Commissioner to impose charges for services provided by Victoria Police personnel in keeping and searching relevant records and supplying information. Schedule 3 of the Regulations lists the range of information services provided by Victoria Police that are subject to full cost recovery of staff time and overheads from users. These services include:

- National Police Certificates: National police checks may be required for purposes such as employment, volunteering, and for occupational-related licensing and registration.¹³ Victoria Police provides the following services related to National Police Certificates (NPC):
 - name checks for volunteers: This includes a search of all relevant police records except fingerprint records to provide notification to an organisation accredited by the Chief

¹¹ Victoria Police (2023), 'Events'. Accessed at <https://www.police.vic.gov.au/events>

¹² Data provided by Victoria Police

¹³ Victoria Police (2022), 'Apply for a national police check'. Accessed at <https://www.police.vic.gov.au/apply-national-police-check>

Commissioner about the existence of any criminal history of volunteers providing services to that organisation.¹⁴

- name checks for other purposes: This service includes a search of all relevant police records except fingerprint records to provide notification about the existence of a criminal history for purposes other than volunteering.
- name checks including fingerprints: This includes a search for all police records including fingerprint records to provide notification about the existence of a criminal history for purposes such as securing a Victorian Security License, Victorian Firearms License, and for a Victoria Police Contractor.
- Ink fingerprints: Victoria Police provides ink fingerprinting services that may be required for visa, passport, or immigration purposes.
- Crime and fire reports: Victoria Police can undertake a search of all relevant police records to provide copies of a crime or fire report for lost, damaged or stolen properties, primarily for insurance purposes.
- Subrogation notices: Under this service, Victoria Police processes subrogation notices provided by loss assessors or insurers to advise of change of ownership or property.
- Collision or accident reports: Victoria Police can search for and provide a copy of collision or accident reports including the first 10 pages. Additional charges apply for each additional page beyond the first 10 pages.

2.2.2.4 Charges for authorising and giving of agency photographs

Under the Act, authorised media organisations may apply to Victoria Police to release agency photographs of convicted offenders. The Act defines an agency photograph as the photograph of a person who has been found guilty of an offence that was taken by an investigative agency or an officer of an investigative agency when:

- the person was arrested by the agency or an office of the agency on suspicion of an offence
- the person was interviewed by the agency or an office of the agency in respect of an offence
- another investigative procedure into the person was carried out by the agency or an officer of the agency in respect of an offence.

Media organisations must make an application to Victoria Police to be classified as an authorised media organisation to be given agency photographs. Upon application from an authorised media organisation, the Chief Commissioner may authorise the release of an agency photograph provided the application has been made within six months of the person photographed being found guilty of an offence.¹⁵ The Act prescribes that the media organisation should pay a prescribed fee to be classified as an authorised media organisation, as well as payment of the prescribed fee each time the media organisation would like to receive agency photographs. Regulations 7 and 8 prescribe these fees. The release of agency photographs is extremely rare, with only one or two agency photographs released over the last 15 years.

¹⁴ Applicants must provide a Community Volunteer Fee number from an accredited organisation to be eligible for the volunteer fee name checks.

¹⁵ The six-month limit is prescribed by section 238 of the Victoria Police Act so as to balance community interests and the personal privacy rights of offenders.

2.2.3 Other regulatory instruments governing Victoria Police

The Victoria Police Regulations are made under the Victoria Police Act and prescribe matters necessary for the purposes of the Act. They prescribe matters such as appointment, promotions and transfers of police officers, drug and alcohol testing for Victoria Police personnel, and designated places for the powers and responsibilities of PSOs.

In addition to the Victoria Police Act, Victoria Police enforces and prosecutes traffic and criminal laws embodied in state and Commonwealth Acts of Parliament.

3. The problem and objectives

This chapter outlines the nature and extent of the problem, which provides the case for regulatory reform.

3.1 Rationale for government regulation to charge for police services

Event organisers, attendees and the community all derive benefits from having safe events. The presence of police at commercial events is important for ensuring the safety and security of attendees, organisers, and the general public. Events with a large number of people attending can give rise to a number of safety risks such as potential criminal activity, disorderly conduct and unforeseen emergencies. Police presence on-site enables a quick and efficient response if any such threats arise. By maintaining order, police presence facilitates the smooth functioning of commercial events and safeguards the welfare of everyone involved.

Victoria Police is funded to provide benefits to all Victorians. The community has the first call on Victoria Police resources, and resources will typically be deployed to the highest risk need in the community. However, as discussed in section 2.2.2, Victoria Police provides additional services or responses to callouts, which directly benefit commercial operators and individuals, creating the need for these public resources to be deployed for primarily private benefits. Therefore, it is appropriate for those who create the need for or derive private benefits from additional policing services (such as organising and attending safe and secure events) to bear the costs associated with providing them. This rationale also applies to other services provided by the police for private benefits such as processing ink fingerprints for visa, passport, or immigration purposes, providing national police certificates and providing agency photographs to authorised media organisations. Excessive demand on these services, without cost recovery, could restrict Victoria Police's ability to service the needs of the general community.

The rationale for charging those who derive commercial or private benefit from police presence is supported by the Victorian Government's *Pricing Principles*. Principle 1 supports the full recovery of the cost of service provided to promote efficient consumption of resources. Full cost recovery also enhances transparency and sends price signals regarding the costs of providing regulatory services.

Principle 2 states that the cost of the service provision should be borne by those who benefit from, or create the need for, the service. Prescribing charges for police to attend commercial events or provide information services sends price signals to those that trigger the need for these services about the true cost of providing these services. In the case of an unforeseen disruption at an event by external parties which requires a police response that could not have been factored into planning police resources for the event, Victoria Police would not apply charges for this response (see section 2.2.2.1). This can promote efficient use of police services and efficient allocation of police resources towards activities that most need them. Pricing Principle 9 relates to ensuring sustainable usage of public services. Not charging for police attendance at events or providing information services may lead to users not appropriately valuing the additional services provided by the police.

3.2 The problem if the fee regulations are not remade

The base case for the Regulations is a scenario in which the fees outlined in section 2.2.2 and Appendix A sunset without being remade. The Regulations authorise the Chief Commissioner to impose charges for services provided by Victoria Police in specified scenarios. Under the base case, Victoria Police would not have an avenue to impose charges on commercial event organisers or for providing information services and agency photographs. It is likely that Victoria Police would still attend events as and when the level of risk at an event is considered by Victoria Police to warrant police attendance. Costs associated with such attendance in the absence of prescribed fees however will need to be recovered from consolidated revenue or from other sources such as the Victoria Police budget instead. This will shift the cost burden from the direct beneficiary (commercial event organisers and attendees and requestors of information) to the community and Victorian taxpayers.

If the Regulations are not remade, Victoria Police's costs in terms of overtime (such as through voluntary duties) would increase and could have implications for resourcing. Victoria Police consider that the qualitative impact of the Regulations sunsetting would be a decline in the collaborative working relationships between event organisers and Victoria Police. Without this stakeholder engagement, event organisers would not receive intelligence-based advice to inform them of potential risks to their events and would not receive advice on security and safety arrangements needed for their event. Additionally, without the stakeholder engagement, Victoria Police may not be aware of certain events being held and would lose the ability to proactively plan a deployment model and resource accordingly. Furthermore, Victoria Police consider that some event organisers might view police attendance as free event security and may avoid making other private security arrangements in an effort to save on costs and manage risks, resulting in sub-optimal security measures being taken during the event.

While police presence at commercial events does provide benefits to the community such as reduced disorderly behaviour and ensuring safety of everyone involved, the key beneficiaries remain the commercial event organisers and event patrons. Funding police resources at commercial events would have a cross-subsidisation effect as the broader community is effectively paying for the benefits that event organisers and event patrons derive from the police.

3.3 Objectives

The Regulations seek to impose fees on users of Victoria Police services, where those resources are used for commercial or private purposes and benefits, allowing taxpayer funded police services to continue to be provided across the whole community. Therefore, the overarching objective of the Regulations is to ensure the efficient use of Victoria Police personnel and resources.

Specifically, the Regulations seek to ensure the fees are:

- **Cost reflective - Fully reflective of costs wherever possible or appropriate**,: Each service that attracts a fee should be reviewed with a view to understanding the cost to deliver it. This requires an understanding of the processes and resources that are necessary to provide these services. Determining the cost of providing services allows for setting fees and charges at levels that reflect the associated cost of delivery.

- **Equitable – Ensure the beneficiary pays:** Parties that benefit from, or create a need for, policing services should bear the cost of providing the service. This objective aims to avoid cross-subsidisation between the direct beneficiaries of the policing services and the broader Victorian community. Consideration also needs to be given to potential cross-subsidisation between different user groups of police services such as event organisers and volunteers who require a police check. Fees should be set a level that reflect the benefit derived by the user. The ability to pay of the recipient also needs to be considered in order to avoid placing undue burden on those who cannot afford to pay for Victoria Police’s services. In some instances, it may be socially beneficial for Victoria Police to waive or reduce fees and charges.
- **Simple - Avoid undue complexity:** Avoidance of cross-subsidisation should not come at the expense of simplicity of the fee structure. Where possible, the fee structure should reduce complexity for users, as well as for Victoria Police in administering the system.

4. Fees cost base

This chapter sets out the current cost base for regulatory activities which relate to the fees and charges listed in the Regulations. The cost bases are discussed for each schedule of the Regulations.

4.1 Costing methodology for Schedule 1

Schedule 1 of the Regulations sets out the charges for personnel deployed at events and for provision of information. As per Section 4(2) and 5(2) of the Regulations, charges for personnel are calculated for the first hour or part of an hour and for every subsequent half hour or part. The charges are set in bands according to personnel rank and VPS grade. Police officers and PSO charges will be set according to rank. 3 and 0 contain the ranks for police officers and PSOs respectively. VPS grades range from Grade 2 to Grade 7.

Table 4.1: Police ranks

Category	Police ranks
Officer	Commander
	Superintendents
	Inspector
Sub-officer	Senior Sergeant
	Sergeant
Other ranks	Leading Senior Constable
	Senior Constable
	First Constable
	Constable
	Recruit
	Reservists

Table 4.2: PSO ranks

Category	Police ranks
PSO Sub-officer	PSO Senior Sergeant
	PSO Sergeant
	Leading Senior Constable
Other ranks	PSO Senior
	PSO 1 st Class
	PSO

Personnel costs consist of salary paid to the personnel and an on-costs for each employee category (police officer, PSO, and VPS). On-costs amount to 87.03 per cent for police officers and PSOs, and 67.53 per cent for VPS employees. The on-costs include:

- holiday pay loading
- long service leave
- payroll tax
- WorkCover
- superannuation
- overheads (administrative and operating expenses supporting the employee)
- depreciation (asset related costs incurred by the employee).

Victoria Police's estimates of the cost base for each fee type is based upon the median salary by officer rank category and on-cost as per the Enterprise Bargaining Agreement (EBA). Under this methodology, personnel charges would be set at the median salary and on-costs for each police rank and VPS grade. The following methodology is used to derive the hourly rate for police officers and PSOs:

- the number of FTE for each employee category is determined based on the total FTE for each rank/VPS grade
- an equivalent total annual salary cost for each rank/VPS grade is estimated based on the respective EBA median salaries at the rank/VPS grade level multiplied by the number of FTE for each rank/VPS grade as on 31 December 2022
- this total annual salary cost for each rank/VPS grade is then multiplied by the relevant on-cost multiplier (see above) for sworn officers and for VPS employees to provide an estimated total annual cost for each rank/VPS grade

- total annual cost for each rank/VPS grade is then divided by the number of hours of availability for each employee category to derive the hourly rate (1,574 hours for police officers and PSO, 1,596 hours for VPS).¹⁶

This methodology is depicted in Figure 4.1 below.

Figure 4.1: Calculation of hourly pay rate for police officers, PSOs and VPS employees



4.2 Costing methodology for Schedule 2

Schedule 2 of the Regulations sets out the costs for other police services. This includes costs for resources including police animals, vehicles, aircraft, and boats. The costs to be recovered and the methodology used to estimate the cost base for each type of resource is outlined in Table 4.3. The costs in the table below do not include personnel charges to operate the service. The personnel charges are covered in 1.

Table 4.3: Costs to be recovered and methodology for other police services.

Police service	Costs to be recovered from fees	Methodology
Dogs and horses	Personnel charges for grooming the dogs and horses	Grooming and maintenance costs are divided by the number of dogs/horses and their working hours.
	Maintenance costs including veterinary services and products, caring and food.	
	Depreciation of each living asset, their related equipment, and housing.	

¹⁶ Based on data provided by Victoria Police

Police service	Costs to be recovered from fees	Methodology
Boats ¹⁷	Depreciation expenses	The unit cost is calculated using the median of total costs (listed to the left) of all vessels in the same class
	Maintenance and related staff labour costs	
	Fuel costs	
	Insurance	
	Berth rental costs for class 1, 2 and certain vessel under class 3	
Police Air Wing (PAW) ¹⁸	Depreciation of shed concrete slab or boat boarding platform that are assigned to certain boats in class 3 and 4	Rotary helicopter fee: The unit cost per hour is delivered by total annual operational costs (listed to the left) divided by 3,600 operational hours
	Depreciation of Williamstown Complex car port as the storage for jet skis	
	Lease costs, finance, maintenance, and labour costs	
	Insurance	
	Fuel costs	

¹⁷ Police boats are classified into five classes:

Class 1 – In-water vessel (≥ 15 meters)

Class 2 – In-water vessel (<15 m, >10 m)

Class 3 – Trailer boats (≤ 10 m, >6m)

Class 4 – Trailer boats (≤ 6m)

Class 5 – Personal watercraft / jet skis

¹⁸ Police Air Wing includes three rotary helicopters and one fixed wing plane.

Police service	Costs to be recovered from fees	Methodology
	Downlink (telecommunications link transmitting video and data to ground personnel)	Fixed Air Wing plane: The per unit hourly cost is derived by the total annual operational
	Pass through costs including hangarage and facilities	costs (listed to the left) by 2,400 operational hours
	Depreciation	
	Leasing expenses (for leased vehicles)	
	Book value (purchase price less depreciation for owned/purchased vehicles)	Leased vehicles: The unit cost per hour is calculated using the average of the total costs (listed in the previous column)
Leased vehicles	Running costs (including car parking costs, fuel costs, tyre replacement and vehicle servicing/ brake replacement calculated by cents per annual average kilometres)	of all leased vehicles divided by the number of sworn operational hours per annum (1,574 hours)
and		
owned/purchased		
vehicles		
operational		
costs ¹⁹	Insurance costs	Owned vehicles: The unit cost per hour is calculated using the average of the total costs (listed in the previous column)
	Accident/ collision costs	of all owned vehicles divided by
	Fit up and decommissioning costs (marking vehicles, fitting out with police	the number of sworn operational hours per annum (1,574 hours)

¹⁹ Vehicles are classified into: motor car (including passenger cars, medium SUV, and large SUV), motorcycle, bus, 4WD, utility vehicle, and operational vans (includes passenger van, divisional van, port transporters and mini brawlers).

Police service	Costs to be recovered from fees	Methodology
	operational equipment and the removal of this equipment	The hourly leased vehicle unit cost and Owned/Purchased vehicle is then consolidated and averaged to create an Hourly Grouped Vehicle unit cost

4.3 Costing methodology for Schedule 3

Schedule 3 of the Regulations sets out the charges for other police information services. Services covered by this schedule include National Police Certificates, ink-fingerprints, lost, stolen or damaged property reports, and collision or accident reports. Activity-based costing is used to estimate the costs of the activities required to deliver these services.

The costs of each service are split into variable activity costs and fixed activity costs.

- **variable activity costs:** These are grouped into activities and tasks and the time spent to complete each task by labour level is calculated at the median salary level associated with employee on-costs.
- **fixed activity costs:** These include fixed labour costs associated with the analysis and administration of fingerprinting services and the fixed fee to access the Australian Criminal Intelligence Commission (ACIC) database when processing name checks for National Police Certificates. Fixed asset charges are only passed onto the services providing digital fingerprinting services as specialised equipment is required to deliver this service.

4.4 Current cost base

The current cost base for police personnel and police resources are outlined in Table 4.4 and Table 4.5 below.

Table 4.4: Current cost base for police personnel based on 2022-23 salary

Personnel rank/grade	Number of personnel at rank/grade	Total annual cost (including oncosts and allowances) ²⁰
Officer	451	\$141,808,410

²⁰ The annual cost is calculated by multiplying the number of personnel at the rank/grade with the annual salary. Allowances of 16.77 per cent and on-costs of 70.26 per cent are added to the total annual salary to derive the annual cost.

Personnel rank/grade	Number of personnel at rank/grade	Total annual cost (including oncosts and allowances) ²⁰
Sub-officer	3,620	\$892,732,172
Other ranks	11,337	\$2,035,184,588
Total sworn personnel cost base	15,408	\$3,069,725,170
PSO Sub-Officer	125	\$22,188,483
PSO other ranks	1,278	\$185,247,095
Total PSO cost base	1,403	\$207,435,578
VPS 1	0	\$0
VPS 2	1,425	\$149,514,972
VPS 3	943	\$128,326,803
VPS 4	848	\$140,686,121
VPS 5	354	\$67,915,662
VPS 6	271	\$68,175,672
VPS 7	15	\$5,305,362
Total VPS cost base	3,856	\$491,748,920
Total cost base for personnel	20,667	\$3,768,909,668

Table 4.5: Current cost base for police resources by 2022-23 costs

Resource	Number of resources	Total annual cost
Dogs	47	\$2,350,059
Horses	22	\$1,166,690
Boats	32	\$12,802,760
Police Air Wing	4	\$47,020,024
Vehicles (owned and leased)	3,549	\$228,364,213
Total	3,654	\$291,703,746

4.5 Cost recovery from event management – personnel and other services

In 2022-23, Victoria Police provided their services to 331 events and recovered \$7.35 million through associated fees and charges. The average revenue received from event attendance fees is \$22,205 while the average cost of attendance for Victoria Police is \$25,106. The cost to deliver these services amounted to \$8.3 million resulting in an under-recovery of nearly \$1 million or 13 per cent. As 0 below shows, costs associated with providing policing services at events have historically been under-recovered.

A review conducted by Victoria Police as part of the RIS process confirmed that rising salary costs have led to an increase in the cost of delivering some services, particularly personnel. Victoria Police also has a waiver policy to waive the full or part amount of the police costs (see section 2.2.2.1). In 2022-23, waivers worth \$562,239 were granted by Victoria Police.

The total amount waived in 2022-23 may potentially increase as there are 14 waiver applications in progress. Therefore, of the \$960,000 under-recovered in 2022-23, already approved waivers make up nearly 60 per cent of this under-recovery. Additional waivers may be granted which will ultimately drive more of the under-recovery. Table 4.9 details the waiver applications received and granted by Victoria Police between 2018-19 and 2022-23.

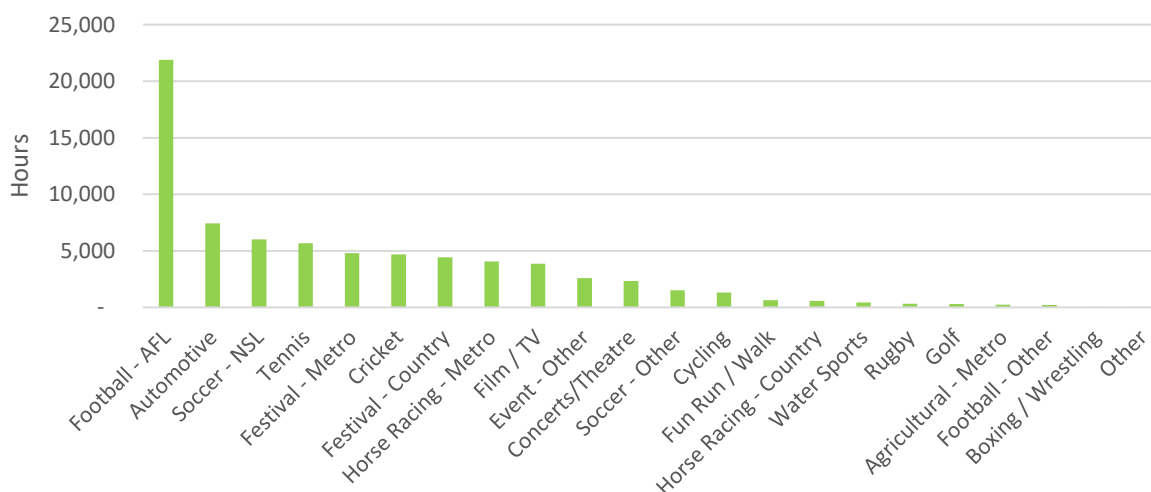
Table 4.6: Cost recovery for event management services 2018-19 to 2022-23

Year	Cost to serve (\$m)	Cost recovery (\$m)	Under-recovery (\$m) (cost recovery – cost to serve)	Under-recovery (%)
2018-19	\$5.96	\$5.47	-\$0.49	-8.88%
2019-20	\$4.91	\$4.53	-\$0.39	-8.56%
2020-21	\$2.30	\$2.15	-\$0.25	-12.19%
2021-22	\$5.02	\$4.47	-\$0.55	-12.29%
2022-23	\$8.31	\$7.35	-\$0.96	-13.01%

Source: Deloitte Access Economics analysis of Victoria Police data

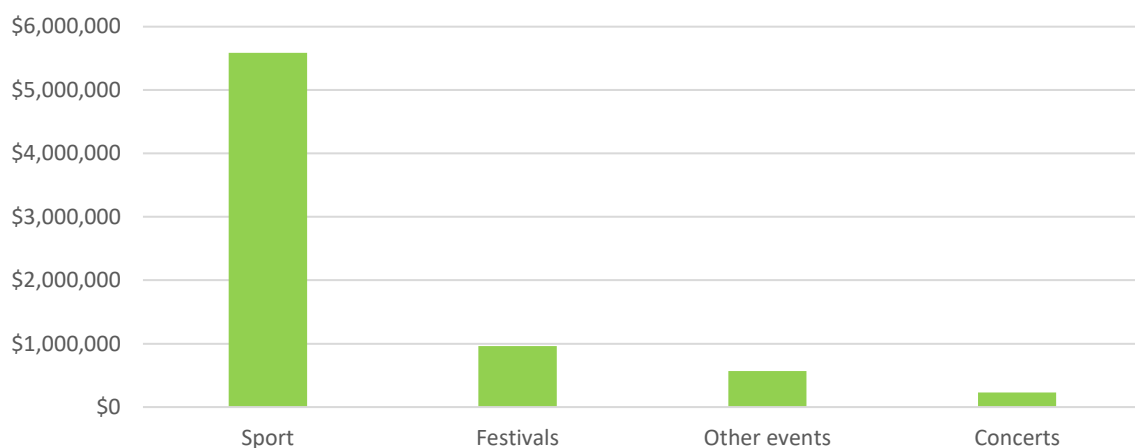
Victoria Police are deployed at events such as sporting events, music festivals, agricultural shows and concerts. As Chart 4.1 and 4.2 below demonstrate, the largest use of police resources for events is AFL football followed by automotive and soccer events. Sporting events are the largest source of event revenue for Victoria Police.

Chart 4.1: Police resource usage by event type, 2022-23



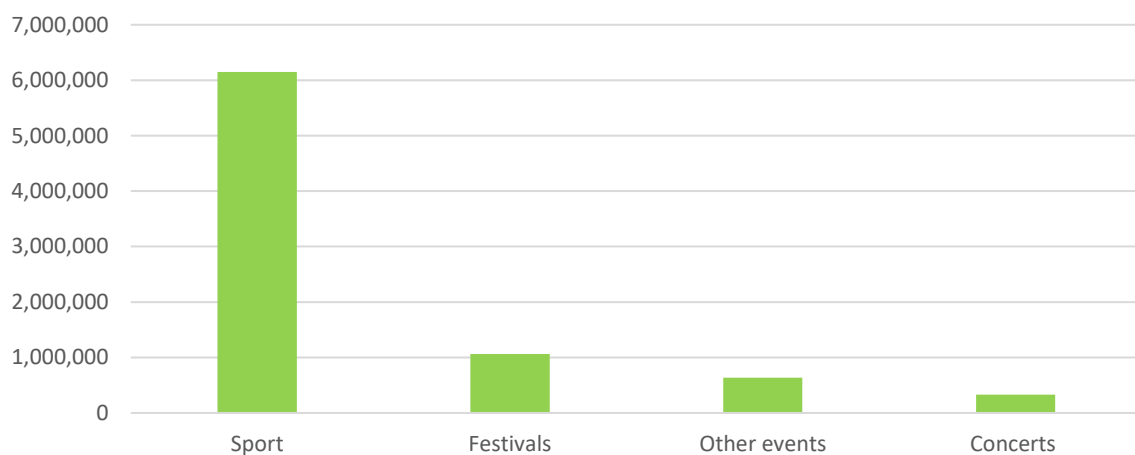
Source: Victoria Police

Chart 4.2: Revenue received by event category in 2022-23 (excluding GST)



Source: Victoria Police

Chart 4.3: Cost incurred by event category in 2022-23



Source: Victoria Police

The personnel and resources deployed for events in 2022-23 are outlined in Table 4.7 below.

Table 4.7: Police personnel and resources deployed at events in 2022-23

Resource	Hours	Percentage
Personnel	71,987	97.8%
Vehicle	1,629	2.2%
Service animals	-	0%

Resource	Hours	Percentage
Total	73,616	100%

Source: Victoria Police

Table 4.8 Police personnel deployed by rank at events in 2022-23

Rank	Hours	Percentage
Officer	888	1.2%
Sub-officer	17,780	24.7%
Other ranks	53,319	74.1%
VPS Personnel	-	-
Total	71,987	100%

Source: Victoria Police

Table 4.9: Waiver applications received by Victoria Police between 2018-19 and 2022-23

Year	Total waiver applications	Waiver applications in progress	Waiver applications denied	Waiver applications granted	Amount waived by Victoria Police	Percentage of applications waived*
2018-19	14	0	3	11	\$164,153	78.6%
2019-20	18	0	3	15	\$132,161	83.3%
2020-21	6	2	1	3	\$128,054	50%
2021-22	13	1	2	10	\$144,424	76.9%

Year	Total waiver applications	Waiver applications in progress	Waiver applications denied	Waiver applications granted	Amount waived by Victoria Police	Percentage of applications waived*
2022-23	23 ²¹	14	0	9	\$562,329	39.1%
Total	74	17	9	48	\$1,131,120	64.9%

Source: Victoria Police

*Based on the number of applications received

4.6 Cost recovery from other police information services

Victoria Police incurred a cost of \$3.5 million in the 2022-23 financial year to deliver the police information services outlined in section 2.2.2.3. These services are subject to cost recovery through fees under Schedule 3 of the Regulations. The total revenue earned for providing these services was \$2.75 million. Therefore, Victoria Police under-recovered nearly \$785,000, or 22 per cent, of their costs. As outlined in Table 4.10 below, under-recovery of costs is consistent across all the other police information services.

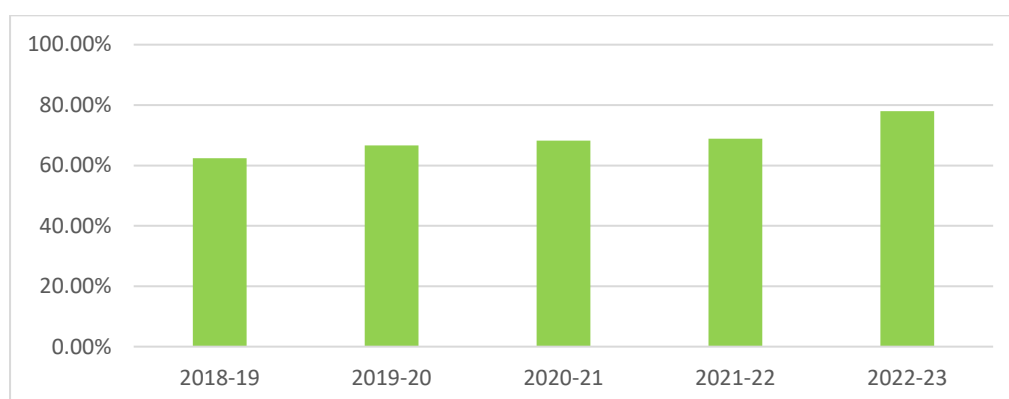
As Chart 4.4 shows, costs for information services have been consistently under-recovered for the last five years. Costs in delivering these services, such as the salary costs for VPS employees, have increased significantly since the Regulations were last remade in 2013. Further, some technology costs involved in delivering the information services have changes such as system maintenance, use of digital fingerprinting machines as opposed to manual ink scanning, and fingerprint analysis systems.

Given the range of activities required to provide police information services that involve the vetting of police records, costs are calculated according to the activities undertaken to provide the service. For example, provision of an NPC involves a national name search, and in some employment categories a fingerprint search is also required. The user is only charged according to the activities performed to provide the service, with the user benefitting from cost efficiencies where the costs are shared by a large number of service users, service improvements and the advantage of technology. This fee also incorporates any fees incurred by Victoria Police in the process, for example in the case of an NPC, the cost of obtaining information from the national database of police information, the ACIC.

The review of fees and charges has identified that while there has been an increase in the cost of providing NPCs, the cost of providing lost/stolen/or damaged property reports and subrogation notices, as well as collision and accident reports has remained unchanged.

²¹There has been an increase in the number of registered events, and consequently, an increase in applications for waivers. Victoria Police also proactively provides the waiver application process to event organisers which has increased awareness of the option to apply for waivers.

Chart 4.4: Cost recovery from police information services



Source: Victoria Police

Table 4.10: Under-recovery from Schedule 3 – Other Police Information Services in 2022-23

Item number	Item	Volume	Cost to serve	Cost recovered through fees	Under-recovery	Under-recovery (%)
Item 1	Volunteer National Police Check	1,446	\$87,396	\$27,416	-\$59,980	-69%
Item 2	Full fee National Police Check	8,676	\$705,571	\$437,764.93	-\$268,806	-38%
Item 3	National Police Check including fingerprints	8,272	\$1,793,432	\$1,631,576	-\$161,854	-9%
Item 7	Insurance Report	3,864	\$279,159	\$195,132	-84,027	-30%
Item 8	Subrogation notice	30	\$675	\$505	-\$170.63	-25%
Item 9	Accident or collision report	8,356	\$669,531	\$459,948	-\$209,584	-31%

Source: Deloitte Access Economics analysis of Victoria Police data

5. Identifying the options

5.1 New charges to be introduced in the Regulations

Remaking the Regulations provides the opportunity to update the fees and charges listed in the Regulations. A review of the Regulations conducted as part of the RIS process has confirmed that rising salary costs have led to an increase in the cost of delivering some of the services, primarily personnel. Since the introduction of the current Regulations, Victoria Police's transport and vehicle options have also changed (see section 5.1.2.1). Some additions to the police fleet such as rotary helicopters have increased functionality and capacity compared to the helicopters in use in 2013 when the Regulations were last remade, thereby increasing the cost profile of the transportation fleet.

Inked fingerprints were not included as part of the pricing review, due to a previous understanding that Victoria Police would cease ink fingerprinting services for immigration, passport, and visa requirements in 2024. This did not eventuate however, and due to the change in organisational direction and time constraints, these service fees were not reviewed and are proposed to remain unchanged in the proposed Regulations.

A number of additional charges have been proposed for inclusion in the Regulations. These changes are outlined in the following sections.

5.1.1 Charges for personnel – Schedule 1

The proposed Regulations include new personnel fees, including PSOs and tactical flight officers, and the removal of VPS Grade 1 employees from the fee schedule. Fees for police personnel and other resources are based on a fixed hourly rate to reflect the actual time a police member, PSO or VPS employee is required to provide the service and are directly related to the relevant police rank and VPS classification.

5.1.1.1 Charges for Protective Services Officers

The proposed Regulations include fees for PSOs ('other ranks') and PSO sub-officers. The inclusion of PSOs directly reflects legislative amendments in the *Police and Emergency Legislation Amendment Act 2020* which amended the Act to specifically enable the regulations to impose fees for services provided by protective services officers. Subsequently the *Justice Legislation Amendment (Police and Other Matters) Act 2022* amended the Act to expressly permit Victoria Police to charge for the services of police officers, PSOs and Victoria Police employees who are deployed to commercial events. PSOs may be deployed for general protective security duties at events to assist with safety and public order. They may also be deployed on public transport and surrounding areas between event venues and train stations. At some events, this may require supervision by a PSO sub-officer. As is the case for current personnel charges, the need for PSO sub-officers and PSO other ranks would be negotiated pre-event by planning members and the event organiser. PSOs are also deployed to provide services in a declared designated place when it is deemed necessary by Victoria Police, not only if requested by the event organiser. The proposed new fees for PSO personnel reflect fees based on a fixed hourly rate to reflect the actual time a PSO is required to provide the service and are directly related to the relevant PSO rank. Where the service provided is for part of an hour, the fee level reflects the disruption to the PSOs normal role or work responsibilities.

5.1.1.2 Charges for flight personnel

The proposed Regulations include fees for tactical flight officers (TFOs) to reflect the full range of personnel that could be used to provide services at a commercial event. The amended Regulations will include charges for the following Victoria Police flight personnel in Schedule 1:

- Chief pilot
- Senior pilot
- Check and Training pilot
- Line pilot
- Tactical flight officer

Where Victoria Police Air Wing services are deployed, a minimum of two specialist TFOs are required to support aircraft operations. This involves extensive flight duties and responsibilities such as operating complex mission equipment, navigation, search and rescue and tactical tasking and can involve protracted tasks in adverse conditions. The current Regulations do not include TFOs, who are paid in accordance with skills and experience. It is anticipated that TFOs and Victoria Police Air Wing services will be rarely charged for at commercial events, as event organisers are typically encouraged pre-event to source other aircraft (if required) due to the limited availability and critical need for police resources to be available for emergency and operational use.

5.1.2 Charges for other services: Schedule 2

5.1.2.1 Land Vehicles

The proposed Regulations include fees for different vehicle types that may be used at commercial events and ensures event organisers are charged correctly for police services. The proposed Regulations have been updated to include the following vehicles:

- four-wheel drive (4WD) Operational Vehicles
- utility vehicles
- operational vans.

While previously listed as ‘police motor car’, a breakdown with more accurate sub-categories of police vehicles has been proposed. Vehicle requirements can vary depending on the nature of an event or where it is held. In some instances, a 4WD or utility vehicle may be required at an event that is hosted on rough terrain, which is more costly to operate than a standard police motor car at a venue with stable infrastructure. In addition, operational vehicles, which include passenger vans, divisional vans, Public Order Response Team Transport and mini brawlers, are often required at major events where a standard motor car is insufficient and are not accurately aligned to other vehicle descriptions in the 2014 Regulations. These are also significantly more costly to operate, so have been included in the proposed Regulations to accurately reflect operational requirements. These vehicles are typically used for major events and use of these services will need to be negotiated pre-event by planning members and event organisers.

In addition, Victoria Police has a range of vehicles that are deployed to provide frontline support to members and VPS employees who work at sporting, entertainment, or other events in accordance with the Regulations. Vehicles deployed upon request include mobile police forward command posts for operation of the Emergency Management cells, and other support vehicles

such as a lighting and toilet truck, tow trucks, brawler trucks and small, medium, and large busses used to transport police officers and employees.

5.1.2.2 Police Air Wing

The proposed Regulations include fees relevant to the new fleet of aircraft utilised by Victoria Police, three AW139 Helicopters and one fixed wing aircraft being a Beech King Air B350 ER. The inclusion accurately reflects the running costs of these aircrafts, including the requirement for TFOs to run the mission systems, in line with current processes. The use of the fleet for event management services is limited and if utilised, will potentially have a significant impact on the cost to service users.

The proposed Regulations also include fees relevant to drones and counter-drone systems, which are often used as a safer and more cost-effective resource for surveying crowd behaviour. They provide greater visibility at events for police (serving as an additional CCTV function) and intercepting potential risks to crowds, particularly at major events. While this technology is relatively new, it is anticipated that it will be more widely used for event management in future. Victoria Police supports costing for the use of drones and counter-drones being reviewed as required, due to ongoing requirements to enhance and update hardware and software to have fit for purpose drones and contemporary counter-drone technology. The technology has been deployed during planned events such as the Victorian Spring Racing Carnival to provide overwatch of protest activity and crowd movement. Victoria Police expect increasing use of these resources in the future. Counter-drones are now used at most major events such as the Australian Open, Grand Prix, and Moto GP. Currently, Victoria Police is only permitted to charge for drone operators (police members) under the Regulations. The inclusion of fees for these services reflects costs associated with the use of this equipment, as separate to the members operating the technology.

In some instances, drones or counter-drone systems may be used as part of a police response or operation that is outside of the event organiser's control. Charges will not apply in these instances. However, where utilised as a proactive police service, such as to complement safety plans, use of drones and subsequent charges will need to be negotiated pre-event between planning members and the event organiser. Drone incursion is often raised as a significant risk to attendees of major events and therefore drone capability is requested on a regular basis by event organisers. If an event organiser requests both drones and counter-drones, the organiser would be required to fund both capabilities. Acknowledging that a drone and counter-drone response are distinct capabilities, Victoria Police advise that where a request is received for one capability and not the other, Victoria Police in consultation with the event organiser will assess the appropriateness of responding with both capabilities and may charge the event organiser for both drone and counter drone response.

5.1.2.3 Water vessels

The proposed Regulations include fees for a wider range of Victorian Water Police vessels, including the personal watercraft (PWC). This inclusion more accurately reflects the engine power and running costs of the specific PWC and the evolving nature of Victoria Police's water policing fleet. The use of water policing vessels for event management services is limited and will likely have minimal impact on the cost to service users.

5.1.3 Other police information services: Schedule 3

5.1.3.1 Electronic fingerprinting scanning

The proposed Regulations include a livescan fingerprints fee which is a segment of an existing name check and fingerprinting service fee. As part of a firearms or private security licence application, individuals require a set of fingerprints to be captured on the Victoria Police law enforcement database. Currently, the only fingerprint service that is available to applicants includes a name checking component which is duplicated within the licence assessment process.

The new fee for livescan only fingerprinting will allow Victoria Police to offer more streamlined services, remove duplication of effort, reduce financial burden to private security and firearms applicants and enable firearms and private security applications to be processed much earlier.

5.1.3.2 Subpoena Documents

The proposed Regulations capture some of the costs associated with the police response to subpoenas in non-police (or non-criminal) cases. The Regulations also include the requirement for members to respond to orders for production of documents issued by various state and federal Government investigative tribunals such as, Victorian Civil and Administrative Tribunal (VCAT) (and its interstate equivalents), Australian Health Practitioner Regulation Agency and the Administrative Appeals Tribunal. The vast majority of subpoenas served on Victoria Police are issued by the Federal Circuit Court and Family Court of Australia, both of which deal with family law cases. The requirement for Victoria Police to comply with subpoenas issued in civil cases to which it is not a party impacts on the normal policing duties of the responding police members. It often involves obtaining archived material and requires members to spend significant time redacting and collating information for purposes that Victoria Police would otherwise not have any involvement in.

5.2 Development of options

As outlined in Chapter 2, the Regulations prescribe the fees and charges for a range of services provided by Victoria Police. The options presented in this chapter are based on an analysis of these services. As the current Regulations are due to sunset on 24 June 2024, the base case is that the Regulations expire, and no new regulations are introduced. Sunsetting regulations are required to be analysed to determine whether they should be remade or allowed to expire. As discussed in 5.3.1 below, DJCS does not consider the base case to be a viable option. Therefore, the Regulations will need to be remade and the RIS will focus on the impacts of remaking the Regulations. The base case will be used as a counterfactual scenario against which the impacts of the options can be assessed.

The fees prescribed in the current Regulations were analysed against the Pricing Principles in the *Pricing for Value* guide. A number of fee options were developed that align with the Victorian Government's objectives for cost recovery as well as the policy objectives identified in Chapter 3.

All the options considered in this RIS include the new fees and charges discussed in section 4.7. There are no changes considered to the fees and charges relating to the agency photographs for

media agencies, as there is very low demand for this service.²² This approach is consistent across the options considered below.

The amendments to the *Victoria Police Act 2013* (see section 2.1.1.1) stipulate that Regulations may prescribe fees by reference to any one or more of the following:

- the type of police services and goods provided
- flat rates or rates per hour or part of an hour
- the same rate or amount for all members of Victoria Police personnel provided, or different rates or amounts depending on:
 - the rank or grade of members of Victorian Police personnel provided, and
 - whether members of Victoria Police personnel provided would or would not otherwise be on duty
- in the case of police services and goods to be provided that are not ordinarily available within Victoria Police, the costs incurred by the Chief Commissioner in acquiring those police services and goods.

The options described below have been developed taking into account this provision in the Act.

5.3 Options for fee structure

5.3.1 Base case (Regulations sunset on 24 June 2024)

The base case is a counterfactual scenario used to provide a common point of comparison for all options. For the purposes of the analysis in this RIS, the base case represents a scenario where the current Regulations sunset on 24 June 2024 and no new Regulations are introduced. Under the base case, Victoria Police would not be able to charge for their services at events or for information services, as it is the Regulations that provide the Chief Commissioner with the authority to charge for these services. In this scenario, provision of police personnel, resources and other services would need to be funded through other sources, such as consolidated revenue.

5.3.2 Option 1: Single hourly/part-hourly fee charged for all events and a single fee charged for all police information services

Under this option, a single hourly and part-hourly fee would be proposed for police personnel and services attendance at events. The fee would be based on the average total cost of providing event management services (including personnel and other services) and cover the cost of personnel and police assets.

Similarly, a single fee would be charged for all police information services and Schedule 3 would be replaced by one fee. This fee would be based on the average cost of providing the different types of information services (national police certificates, accident reports, insurance reports, subrogation notices and subpoena management services).

5.3.3 Option 2: Broad categories of fees aligned with risk/activity type

Under this option, fees for events management would be based upon an assessment of whether the event requiring police personnel and other services is considered a low, medium, or high-

²² There have only been two instances over the last 15 years where requests for agency photographs have been made. Despite the low use of this service, Victoria Police supports the continued inclusion of these fees in the Regulations in the event uptake increases in the future. Decisions to approve a request for use of an agency photograph are made on public interest grounds.

risk event. As discussed in section **Error! Reference source not found.**, Victoria Police undertakes a risk assessment for all events they are requested to attend which includes consideration of the:

- nature of the event, such as alcohol consumption or suspected illicit drug consumption
- anticipated attendance numbers and demographic
- event history or staging of similar events
- knowledge of the event organiser/promoter/venue manager
- liquor licensing factors
- current political, cultural, economic, social, or environmental factors
- intelligence, including attendance of controversial guests
- threat assessment ratings, including terrorism.

This option was developed to test with stakeholders the viability of an approach in which risk assessment would be used to classify the risk profile of an event requiring police presence into broad risk categories (e.g. a low, medium, or high-risk category). Under this option, the Regulations would prescribe the fees for the three risk categories while the actual classification of events into the categories would be done by Victoria Police upon application by the event organiser.

Similarly, all information services for each item in Schedule 3 would be charged a single fee. Under Schedule 3 there are three types of fees for National Police Certificates, two types of fees for lost, stolen or damaged properties, and two fee types for collision or accident reports (see Appendix A). Under this option, each of these categories will incur a single fee. For instance, the three types of National Police Certificate fees will be consolidated into one fee type.

5.3.4 Costs based on line item costs for personnel, resources, and effort involved (status quo)

Under this option, fees would be charged at a more granular, line-item level, as is currently the case (see Appendix A). These fees would be based on the per hour cost of providing personnel (based on salaries) and other police resources for events and provide for variation in costs for delivering the information services.

6. Options analysis

As discussed in the preceding chapters, the Regulations prescribe fees and charges for the services provided by Victoria Police that provide a commercial or private benefit to users. The Regulations therefore impose a financial burden on event organisers and individuals. The impact of the options introduced in Chapter 5 for the fee schedules are assessed in this chapter through a multi-criteria analysis (MCA) which aligns with the principles outlined in the *Pricing for Value* guide (the guide) and the identified objectives of the Regulations (see section 3.3).

6.1 Multi-Criteria Analysis (MCA) methodology

The method used to compare and assess the options identified in Chapter 5 applies the use of MCA. MCA involves a structured assessment of the different options relative to the base case using a series of criteria. This approach has been chosen as the preferred analysis tool as it provides a structured and transparent approach that can balance several distinct impacts, for example, the extent to which the fees are reflective of the costs incurred in delivering the service versus the simplicity in which the fee schedule is understood by users.

MCA requires judgement as to how the proposed options will contribute to a series of criteria selected to reflect the benefits and costs associated with each option. Each criterion is assigned a weight reflecting its importance to the policy decision. A weighted score is then derived for each option, and the option with the highest weighted score is then selected as the preferred option.

MCA is a technique used to assess policy options against a set of decision criteria. It enables a transparent comparison of options using a mixture of quantitative and qualitative information and allows analysis to consider a wider range of criteria (e.g. equitable considerations) which are not typically included in other common financial analyses, like a break-even analysis. All necessary subjective judgements and assumptions used to determine options and criteria, and to assign scores and weights, are made explicit in the write up. The preferences of the decision maker reflected in these judgements and assumptions can be readily changed through a sensitivity analysis or by incorporating alternative indicators.

6.1.1 Application of the Pricing Principles

The Regulations enable Victoria Police to recover the cost of providing their services. Therefore, in line with the objectives of the Regulations, the relevant and appropriate Pricing Principles from the guide have been applied in this RIS to identify options for changes to the fees and charges in the Regulations.

The primary Pricing Principles considered most relevant for this RIS are:

Principle 1: Agencies should aim to recover the full costs of service provision to promote efficient consumption. Principle 1 articulates a foundational financial sustainability objective for any set of fees and charges for government services or activities. It also highlights that cost recovery can promote efficient consumption of government goods or services.

The aim of cost recovery from event organisers and individuals is to promote the financially sustainable and efficient use of police services. Therefore, Principle 1 is relevant to the

assessment of the Regulations' fees and charges and relates directly to the objective of cost reflectivity as defined in Chapter 3.

Principle 2: The cost-of-service provision should be borne by those who benefit from the service.

Principle 2 suggests that by placing the cost burden of regulatory services to its beneficiaries (rather than those costs being borne by the public through consolidated revenue), it ensures that those who do not benefit from the services do not cross-subsidise those who do. This Principle relates directly to the objective of equity as defined in Chapter 3.

Principle 5: The price of services should not limit access to those with a lower ability to pay:

Principle 5 suggests that by considering the users' ability to pay, the pricing structure can ensure that user groups such as volunteers and small event organisers are not priced out of accessing policing services. As the Commissioner has the power to waive fees and charges, the ability to pay is considered in the administration of the Regulations, rather than prescribed by the Regulations themselves.

Principle 5 is therefore relevant for assessing the fee options in this RIS as it ensures equitable access to police services. This Principle relates directly to the objective of equity as defined in Chapter 3.

Pricing Principle 7: The public should share in the value generated by pricing based on user differentiation. Principle 7 suggests that by enabling the consideration of factors such as risk profile and willingness to pay, this Principle supports differentiated pricing for users. While Principle 7 also includes consideration of the users' ability to pay, this is taken into consideration in Principle 5.

Principle 7 is relevant for assessing the fee options in this RIS as the options can be assessed on their ability to accurately reflect the risk posed by users, thereby ensuring prices charges are reflective of the effort of delivering policing services.

Pricing Principle 8: Pricing should support positive behaviours. Principle 8 suggests that prices should be structured in a way that users are encouraged to adopt positive behaviours and use resources efficiently. The principle considers the implications that pricing for full cost recovery may have on users' behaviour such as evading regulatory obligations.

Principle 8 is relevant for assessing the fee options as the options can be assessed on their potential impact on event organisers' willingness to engage with Victoria Police for their event.

Principle 11: Pricing structures should be easy to understand and simple to administer: Principle 11 suggests that developing a pricing structure that is easy to understand promotes clarity about the costs to be incurred by the users. This reduces queries for Victoria Police regarding ambiguities in the pricing structure. It also allows users to follow the pricing structure easily and quickly. In these ways, both Victoria Police and users operate more efficiently. This principle relates directly to the objective of simplicity as defined Chapter 3.

6.1.2 Defining criteria for multi-criteria analysis

The criteria used to assess options aligns with the Victorian Government's *Pricing for Value* Pricing Principles identified above. By design, the *Pricing for Value* Pricing Principles are flexible and able to be applied in a wide range of scenarios, from the Government's provision of services to industry managed co-regulatory schemes.

While all the Pricing Principles pose relevant considerations in cost-recovery settings, the key principles below have been chosen as those that most closely align with the objectives of the proposed options to be considered in this RIS (see section 3.3). Here, the primary policy objective for the fees and charges within the Regulations is to ensure the efficient use of Victoria Police personnel and resources.

For simplicity in this RIS, **Error! Reference source not found.** provides a summary of the criteria of this analysis and the Pricing Principles considered in the context of remaking the Regulations.

Table 6.1: Criterion for MCA

Criterion	Relevance	Weighting
Criterion 1: Cost reflective	<p>The fees and charges set should reflect the risks posed by the users and the costs to Victoria Police associated with providing the services for which the charges are collected. Full cost recovery accounting for risk promotes the efficient consumption and provision of these services.</p> <p>This criterion is based on Pricing Principles 1, 7 and 8.</p>	33.3%
Criterion 2: Equity	<p>To encourage efficient consumption and provision of policing services, the costs should be borne by those who benefit from or create the need for them. This criterion implicitly aims to avoid cross-subsidisation as far as practicable by attributing the fees and charges directly to those who trigger the need for the service. This criterion also reflects the objective of setting fees and charges at levels that do not limit accessibility or capacity to pay.</p> <p>This criterion is based on Pricing Principles 2 and 5.</p>	33.3%
Criterion 3: Simplicity	<p>The fees and charges should be easy for users to understand and simple for the fee-collecting entity to administer. Where possible, a simple and clear fee schedule can reduce complexity, decreasing the amount of time spent by users in understanding the fees involved.</p> <p>This criterion is based on Pricing Principle 11.</p>	33.3%
Total weighting		100%

6.1.3 Scale

Under MCA, each option is scored against each criterion on a scale from -10 to +10, based on how each option measures against that criterion in comparison to the base case (see Table 6.2). The option that receives the highest weighted score of all the criteria is then selected as the preferred option. As the analysis is assessing options in comparison to the base case, the base case receives a score of zero for all criteria.

Table 6.2 : Options assessment scoring criteria

Negative					Neutral	Positive				
-10	-7	-5	-3	-1	0	1	3	5	7	10
Very high	High	Medium	Low	Very low	Nil	Very low	Low	Medium	High	Very high

6.2 Multi-criteria analysis

6.2.1 Criterion 1: Reflective of costs and risks

Table 6.3: Summary of scores for Criterion 1

Criteria	Weight	Option 1	Option 2	Option 3
		<i>Single fee charged for all events and for all police information services</i>	<i>Broad categories of fees aligned with risk/activity type</i>	<i>Costs based on line item costs for personnel, resources and effort involved (Status quo)</i>
Reflective of costs and risks	33.3%	3	5	9
Weighted score		1.33	2.33	4.66

6.2.1.1 Base case

Under the base case, the Regulations would sunset without being remade. This would mean that Victoria Police would no longer have the mechanism to collect fees and charges from the users of its additional policing services. Therefore, no costs would be recovered from users. The cost of these services would need to be covered through avenues such as the consolidated revenue, giving rise to a cross-subsidy from Victorians to support the costs of policing events and providing information services. The base case is included as a point of comparison for the other options analysed below and is therefore awarded a score of 0.

6.2.1.2 Option 1: Single fee for charged for all events and for all police information services

Option 1 receives a score of 3 against this criterion. Relative to the base case, Option 1 provides a mechanism for recovering the costs incurred by Victoria Police in providing the additional services that users directly benefit from. As such, Option 1 allows for relatively more reflectivity of the costs incurred by Victoria Police than the base case and is awarded a positive score. However, having one prescribed fee does not reflect the underlying risks posed by each individual event and the consequential number of police personnel, services or information provided.

Given the fees under this option would provide for charging a single fee for all events and for all information services, Option 1 would inevitably lead to under-recovery or over-recovery of costs in most instances. While this option could achieve similar levels of aggregate fee revenue as other options a single fee charged for all events and information services would not accurately reflect the specific costs involved to the users of the services. Stakeholders consulted noted that under this option, in the context of police presence at events, users would not have any visibility over the actual level of police personnel and resources used for their event and it would not accurately reflect the risks posed by their events.

An unintended consequence from Option 1 could be an impact on event organisers' willingness to engage with Victoria Police about their event. Having a single fixed fee for all events may disincentivise some event organisers from arranging private security guards, leading to an increased reliance on police resources. On the other hand, a fixed fee may discourage some event organisers from requesting police resources due to the cost involved, leading to an under-utilisation of police services. Both these circumstances would lead to an inefficient use of police resources.

6.2.1.3 Option 2: Broad categories of fees aligned with risk/activity type

Option 2 receives a score of 5 against this criterion. Under Option 2, events will be categorised into low, medium, and high-risk categories and similar information services will be grouped under a single category. Fees will then be set according to the risk level of events and category of information services. Higher risk events will attract a higher fee than lower risk events, and information services will be charged according to the average cost of delivering the respective category of services. This option therefore by definition is more reflective of costs and risks involved compared to Option 1.

While Option 2 better reflects the costs and risks, it only receives a marginally better score than Option 1. Grouping all events and information services into broad categories still will not fully account for the individual risks posed by events or the effort involved in delivering each information service.

Stakeholders involved in event organisation stated that knowing in advance what category their event falls under would be beneficial as they would know the police costs to be incurred upfront which help with their budgeting for the event. However, the stakeholders noted that such an option would require a great deal of transparency from Victoria Police about how events were being categorised ahead of time and an opportunity to consult and negotiate with Victoria Police about that risk assessment. It was acknowledged that assessing risk in advance was difficult for Victoria Police and stakeholders alike, particularly in cases where the risk profile of specific events may change over time depending on the broader social context surrounding an event. While Victoria Police's administrative process of risk classification is beyond the scope of the

Regulations, it is an important consideration for stakeholders. Therefore, having one fee prescribed by risk category would not sufficiently reflect the actual costs incurred by Victoria Police. Additionally, the perception of the risk posed by an event may differ between Victoria Police and the event organiser. Some stakeholders noted that while the costs may reflect effort, the effort may not be commensurate with the event's risk.

Having a single fee for each resource for each risk category may lead to unintended outcomes similar to those described for Option 1 in terms of potentially inefficient use of police services, although the scale of any such unintended consequence would be relatively lower under this option than for Option 1. This is because the charges set under Option 2 would be closer to the actual level of risk involved than a single fee under Option 1, and would likely increase the willingness of event organisers to engage with police for their event relative to Option 1.

6.2.1.4 Option 3: Costs based on line item costs for personnel, resources, and effort involved (Status quo with amendments)

Option 3 receives a score of 9 against this criterion. Under Option 3, users will be charged fees based on the personnel, assets and effort involved in delivering the services. Charging by line item will fully reflect the personnel, assets and activities involved in delivering the service. This makes it reflective of costs and risks involved and promotes transparency for users. Invoices are delivered after the event and therefore the actual services used would be charged to the end user. Some stakeholders indicated that they prefer the status quo as it enables them to understand the number and designation of the police personnel and resources deployed for their event. No stakeholders consulted believed that Options 1 or 2 would be more cost reflective. All stakeholders emphasised the importance of transparent risk assessment practices under the status quo, noting that this a matter for police policies and is not prescribed in the Regulations, and is therefore out of scope for this RIS.

As option 3 is based on the actual level of police effort involved, it is likely that the unintended consequences described under Options 1 and 2 will be minimal.

Activity based costing has been used by Victoria Police to determine costs of delivering information services. Activity based costing allows the assignment of costs to specific activities or processes within an organisation in order to more accurately allocate those costs to the services that consume those activities. The charges for the information services are set by considering this cost base.

Therefore, relative to Options 1 and 2, Option 3 is much more reflective of the associated costs and provides greater opportunity for transparent consideration of risks. As such, this option receives a score of 9 for this criterion. While the charges for events would be fully reflective of the costs and risks involved, the charges for the information services still operate as a set fee for the service and does not consider variation between users. Therefore, this option is not awarded a score of 10.

6.2.2 Criterion 2: Equity

Table 6.4: Summary of scores for Criterion 2

Criteria	Weight	Option 1 <i>Single fee charged for all events and for all police information services</i>	Option 2 <i>Broad categories of fees aligned with risk/activity type</i>	Option 3 <i>Costs based on line item costs for personnel, resources and effort involved (Status quo)</i>
Equity	33.3%	2	4	9
Weighted score		1.33	2.33	4.66

6.2.2.1 Base case

Under the base case, event organisers and users of police information services would not pay for the services they use (or for which they create the need). The costs incurred by Victoria Police would instead be recovered from consolidated revenue or the Victoria Police budget. As such, under the base case, users who create the need for additional police services do not bear the cost themselves. Instead, the cost would be borne by Victorian taxpayers and the community. The base case is awarded a score of 0 in the MCA as a counterfactual against which Options 1, 2 and 3 will be compared.

6.2.2.2 Option 1: Single fee for charged for all events and for all police information services

Option 1 receives a score of 2 against this criterion. Option 1 is somewhat better than the base case as it allows a mechanism through which event organisers and individuals users pay for the services for which they create the need and/or benefit from. Option 1 reduces the effect of cross-subsidisation by directly charging users of police services. Therefore, this option is awarded a positive score as it presents a lower level of cross-subsidisation and is more equitable than the base case.

However, given all events and information services will be charged the same rate, these fees will not accurately reflect the level of personnel and effort required for individual events and each information request. Therefore, there will inevitably be cross-subsidisation between users of police services. For instance, under this option, a small regional music festival would be charged the same rate that a stadium would be charged for police presence at an international sporting event. Similarly, for information services, those who require a copy of an accident report would be charged the same as an individual seeking a police check. While this option would mitigate the cross-subsidisation between those who derive private benefit from police services and the broader Victorian community, it would still lead to substantial cross-subsidisation between the users of the services. Stakeholders involved in event organisation noted that there can be significant differences between the appropriate level of police attendance at their events, and therefore prescribing a single charge for all events could lead to an increase in the applications for waivers, as not all event organisers will be able to afford a flat rate.

6.2.2.3 Option 2: Broad categories of fees aligned with risk/activity type

Option 2 receives a score of 5 against this criterion. Under Option 2, the level of cross-subsidisation between users is reduced as events and services are classified according to risk and activity type respectively and are charged accordingly. This inherently promotes greater equity between user cohorts than Option 1. There is an improvement (but not complete reduction) in cross-subsidisation between users.

Additionally, under this option cross-subsidisation between users for some services would remain. For example, a police check for volunteering purposes would be charged the same as someone seeking a police check for paid employment or a passport.

6.2.3.4 Option 3: Costs based on line item costs for personnel, resources, and effort involved (status quo with amendments)

Option 3 receives a score of 9 against this criterion. Compared to Options 1 and 2, Option 3 would even further increase equity between users as the personnel and resources involved in delivering each service are accounted for in the charges. Additionally, under this option, volunteers would be charged a lower fee for a police check which acknowledges the benefits that volunteers provide to society and the fact that volunteers do not derive private financial benefit for their time. This option minimises cross-subsidisation significantly by considering the personnel, resources and efforts required for each service and charging accordingly. No stakeholders consulted were not in favour of changes that might increase cross-subsidisation between different types of events.

6.2.3 Criterion 3: Simplicity

Table 6.5: Summary of scores for Criterion 3

Criteria	Weight	Option 1	Option 2	Option 3
		<i>Single fee charged for all events and for all police information services</i>	<i>Broad categories of fees aligned with risk/activity type</i>	<i>Costs based on line item costs for personnel, resources and effort involved (Status quo)</i>
Simplicity	33.3%	-1	-2	-4
Weighted score		1.33	2.33	4.66

6.2.3.1 Base case

Under the base case, the Regulations outlining the fees and charges would not exist, and there would be no alternate mechanism for the police to recover their costs. Therefore, under the base case, there is nothing to be understood by the users and nothing for Victoria Police to administer. The base case is awarded a score of 0 and will be used as a point of comparison for options 1, 2 and 3.

6.2.3.2 Option 1: Single fee for charged for all events and for all police information services

Option 1 receives a score of -1 against this criterion. Option 1 would prescribe a fee for events and information services. In relation to the base case, this slightly increases complexity as users

will need to interpret and understand the fees and charges, and Victoria Police will need to administer the fees. Given this option only introduces a single fee for personnel and services, this option is not considered overly complex. Therefore, as this option is marginally more complex than the base case, it is awarded a small negative score.

Having a single fee for all events will make it easier for event organisers to accurately budget for police costs as this will remain constant regardless of the scale of the event. Similarly, all users of police information services will only have to consider a single cost regardless of the service they would like to access.

6.2.3.3 Option 2: Broad categories of fees aligned with risk/activity type

Option 2 receives a score of -2 against this criterion. Under Option 2, there will be multiple bands of fees and charges for events/ services. This makes it relatively more complex to understand than the base case, where no fees would be charged, and Option 1, where a single fee would be charged. This is especially the case for events, as organisers will need to ascertain which risk category their event will likely fall under to estimate the charges they will be required to pay. For information services, this option would remain relatively simple to understand, compared to Option 1, as users requesting the service would easily be able to ascertain what type of information they are requesting and the corresponding fee they would be required to pay.

Stakeholders involved in event organisation noted that Option 2 would be difficult to implement in practice, as the risk profile of an event can change rapidly based on factors outside the control of an event organisers such as new intelligence received by Victoria Police. This could lead to a change in the event classification, and therefore police costs, changing with every change in the risk profile, or otherwise would risk locking in one type of risk assessment regardless of how risk might change over time. This can lead to uncertainty for event organisers about their costs and greater administrative work for Victoria Police to accurately classify an event.

6.2.3.4 Costs based on line item costs for personnel, resources, and effort involved (Status quo with amendments)

Option 3 receives a score of -4 against this criterion. Option 3 would prescribe a more complex fee schedule relative to Options 1 and 2 as it will lay out line-item fees for police personnel, assets and information services.

For events, Victoria Police will need to accurately track the personnel and resources deployed to an event and will need to create a detailed invoice for the user. This will introduce complexity for Victoria Police relative to the base case and Options 1 and 2, and for the user to understand the charges involved. The impact of this is moderated somewhat by the fact that Victoria Police provide a quote prior to the event which gives organisers an indication of the expected costs. For information services, this option is marginally more complex to understand as under Options 1 and 2.

6.3 Identification of the preferred option

The table below presents a summary of the MCA scores assigned to the criteria and reflects the discussion throughout this section of the RIS. The scores are weighted as per the framework outlined in section 5, in order to produce a weighted score for each option. This approach balances the need for a fee structure which is appropriately cost and risk reflective, equitable and is a simple mechanism for Victoria Police to administer and users of their services to

understand. The results of the MCA determine that Option 3 is preferred to the base case as it has the highest weighted score of all options considered.

Table 6.6: MCA results

Criteria	Weight	Option 1 <i>Single fee charged for all events and for all police information services</i>	Option 2 <i>Broad categories of fees aligned with risk/activity type</i>	Option 3 <i>Costs based on line item costs for personnel, resources and effort involved (Status quo)</i>
Reflective of costs and risks	33.3%	3	5	9
Equity	33.3%	2	4	9
Simplicity	33.3%	-1	-2	-4
Weighted score		1.33	2.33	4.66

6.4 Impact of the preferred option

The proposed fees and charges under the preferred option are outlined in Tables 6.7 to 6.9. Consistent with the current Regulations, the services of police personnel and resources will be charged according to the time of their deployment. All personnel and resources deployed are charged for a minimum of one hour, consistent with the status quo upon which the preferred option is based. For instance, if an officer is deployed for 30 minutes, the event organisers will be charged \$227.40 as per Table 6.8. An officer deployed for 90 minutes will be charged at \$341.10 (\$227.40 + \$113.70).

The future costs and revenue associated with the preferred options and the level of cost recovery is dependent upon the number of events that are held in Victoria and the extent of the waiver power used. However, historical data can be used for an illustration of the potential impacts of the preferred option.

The annual average revenue for Victoria Police from events over the next 10 years is estimated to be \$9.1 million (undiscounted), with a present value of \$76.5 million using a 4 per cent

discount rate.²³ The volume of police personnel and resources was estimated using an average of 2018-19 and 2022-23 data. The data from the intervening years was not included due to the effects of the COVID-19 pandemic. The volume of personnel and resources was multiplied by the proposed fees and charges in Table 6.8 and Table 6.9, and then divided by the number of events in 2022-23 to estimate the average revenue per event. The number of events in Victoria over the next 10 years was estimated by increasing the number of events by the average population growth of 1.6 per cent per annum. As mentioned above, this is an illustrative estimate based on the available data. It does not factor in the waivers granted by Victoria Police. The total fees charged, and corresponding revenue may increase as a result of the legislative change enabling fees to be charged in the area surrounding the venue. The impact of this change has not been estimated as Victoria Police policy and processes (that will determine the use of this power) are currently under development.

Stakeholders consulted have stated that police costs already form a significant proportion of an event's total cost. Any increases in the policing costs might potentially have an adverse impact on the events sector in Victoria. Some stakeholders consulted stated that the Victorian Government has implemented a strategy to attract more events to Victoria following the COVID-19 pandemic. The stakeholders noted that an increase in the police costs for event attendance might make Victoria less competitive compared to other jurisdictions with lower police charges. Stakeholders also stated that increase in costs for policing at events might divert money spent on other areas of the event and can potentially reduce the economic benefits that events may provide such as through additional employment. However, stakeholders also noted that notwithstanding police costs, Victoria is an attractive destination for event organisers given the scale of the state's market.

Event organisers might also potentially face increases in police costs once the amendments authorising the Chief Commissioner to charge for police services outside the event venue (see section 2.1.1.1) come into effect. While this legislative amendment is beyond the scope of this RIS it is a significant concern for stakeholders, with many stakeholders raising questions about how this power would be used in practice and expressing an interest and willingness to work closely with Victoria Police in determining the appropriate use of this power. The total impact of the increase in fees and charges for police services will depend on the extent to which this new authority to charge for services outside the event venue will be used by Victoria Police.

Similarly, historical data from 2018-19 to 2022-23 was used to estimate the average number of transactions per year for police information services and the revenue was estimated using the proposed fees in Table 6.10. Revenue over 10 years was estimated using a 1.6 per cent per annum growth rate in demand for police services, in line with the estimated population growth. The present value of revenue was estimated using a discount rate of 4 per cent. This resulted in an estimate of the average annual revenue earned (undiscounted) by Victoria Police through

²³ Department of Treasury and Finance guidelines require that impact analyses estimate the total value of costs and/or benefits over a given time period in "present values", which involves discounting values in future by a discount rate to reflect a time preference and that a future dollar is worth less than a current dollar. See, for example, Department of Treasury and Finance (2013), 'Economic evaluation for Business Cases Technical guidelines' at <https://www.dtf.vic.gov.au/sites/default/files/2018-03/Economic%20Evaluation%20-%20Technical%20Guide.doc>

police information services of \$5.3 million and a present value of \$36.4 million over the 10 year life of the proposed Regulations.

The future costs and revenue associated with the preferred options and the level of cost recovery is dependent upon the number of events that are held in Victoria and the extent of the waiver power used. However, using historical data, this RIS provides an illustration of the potential scale of fee revenue over the 10 year life of the proposed Regulations as being an annual average (undiscounted) impact of \$14.4 million (\$9.1 million from fees for personnel and resources deployed to events and \$5.3 million from fees for police information services), with a present value of \$112.9 million (\$76.5 million from fees for personnel and resources deployed to events and \$36.4 million from fees for police information services). The total fees charged for personnel and resources deployed to events may increase as a result of the legislative change enabling fees to be charged in the area surrounding the venue. The impact of this change has not been estimated as Victoria Police policy and processes (that will determine the use of this power) are currently under development.

In terms of the impact of the proposed fees for events on individual events, it is difficult to estimate the likely impact of the proposed fees on a per-event basis, given the wide variation in the nature of events held in Victoria, the different drivers of risk associated with those events and the corresponding level of police personnel deployed, or the extent to which police vehicles or other resources may be required.

Victoria Police advises that it provides police resourcing at commercial events where there is a demonstrable operational risk or need to ensure public order, and the risk cannot be reasonably mitigated by the event organiser or where there is an overriding community or government expectation that police will attend the event. When planning for an event, Victoria Police considers numerous factors and utilises intelligence to ascertain the level of risk identified – although this is subject to change. While no two events are the same, due to compounding factors including but not limited to current political, cultural, economic, social, or environmental factors, cohort in attendance, location, volume of attendees, there are events that present lower risk than others.

On this basis, Victoria Police has developed illustrative estimates of potential costs of police personnel attendance at events depending on whether Victoria Police’s risk assessment indicates that small, medium or large police presence is required. Using samples of invoices for events with varying levels of attendance by personnel, Victoria Police provided illustrative examples of these different levels of police presence based on hours of officer (e.g. commander, superintendent or inspector), sub-officer (e.g. senior sergeant or sergeant) and other rank (e.g. leading senior constable, senior constable, first constable, constable, recruit or reservist). The below table shows the illustrative estimates of effort and the estimated corresponding cost for an event held in 2023-24 based on both the current fees and the proposed fees.

The illustrative estimates provided by Victoria Police indicate that, across a range of levels of effort, the potential impact on the fees associated with police personnel attending an event would be in the order of 13% for small, medium and large police presences at an event.

Table 6.7: Illustrative estimates of costs of a small, medium or large police personnel presence at an event based on the current and proposed fees

Level of police effort	Officer hours	Sub-officer hours	Other rank hours	Cost based on current fees	Cost based on proposed fees
Small	0	15	40	\$6,398.50	\$7,213.00
Medium	2	47.5	144.5	\$22,558.50	\$25,394.95
Large	6.5	123	342	\$55,179.70	\$62,272.50

Source: Deloitte Access Economics analysis of Victoria Police data

As noted in Appendix B, the legislative head of power to charge fees for services outside an event venue and the way in which this power may be used in future was of significant concern to stakeholders. Many stakeholders raised questions about how this power would be used in practice, and how its use would impact the costs they would incur for police services. Some stakeholders also asked questions about the extent to which there were viable alternatives to some services offered by police outside a venue, with one stakeholder noting that while private security could be used to mitigate the need for police in areas outside the venue, private security guards do not have the same level of authority that police do. Stakeholders generally expressed an interest and willingness to work closely with Victoria Police in determining the appropriate use of this power. Victoria Police state that stakeholders will be consulted and that Victoria Police intends to publish any updated policy position regarding the use of this power at the same time as the commencement of the Regulations.

Table 6.8: Proposed fees for Schedule 1 Personnel for 2023-24

Personnel	2023-24 Published fee for the first hour or part	2023-24 Proposed fee value ²⁴	Increase in fee value	Percentage increase	2023-24 Published fee for subsequent ½ hour or part	2023-24 Proposed fee value	Proposed fee value increase
Officer	\$184.40	\$227.40	\$43.00	23%	\$92.20	\$113.70	\$21.50
Sub-officer	\$138.30	\$167.00	\$28.70	21%	\$69.20	\$83.50	\$14.30
Other ranks	\$108.10	\$117.70	\$9.60	9%	\$54.10	\$58.90	\$4.80

²⁴ The value of the fee has been calculated using the 2023-24 fee unit value of \$15.9.

PSO sub-officer	NEW FEE	\$119.30	NOT APPLICABLE		NEW FEE	\$59.70	N/A
PSO Other ranks	NEW FEE	\$92.20	NOT APPLICABLE		NEW FEE	\$46.10	N/A
Chief Pilot	NEW FEE	\$211.50	NOT APPLICABLE		NEW FEE	\$105.80	N/A
Senior Pilot	NEW FEE	\$206.70	NOT APPLICABLE		NEW FEE	\$103.40	N/A
Check and training pilot	NEW FEE	\$187.60	NOT APPLICABLE		NEW FEE	\$93.80	N/A
Line pilot	NEW FEE	\$181.30	NOT APPLICABLE		NEW FEE	\$90.70	N/A
Tactical flight officer	NEW FEE	\$162.20	NOT APPLICABLE		NEW FEE	\$81.10	N/A
VPS Grade 7	\$200.30	\$225.80	\$25.50	13%	\$100.20	\$112.90	\$12.70
VPS Grade 6	\$154.20	\$165.40	\$11.20	7%	\$77.10	\$82.70	\$5.60
VPS Grade 5	\$119.30	\$127.20	\$7.90	7%	\$59.70	\$63.60	\$3.90
VPS Grade 4	\$98.60	\$106.50	\$7.90	8%	\$49.30	\$53.30	\$4.00
VPS Grade 3	\$82.70	\$89.00	\$6.30	8%	\$41.40	\$44.50	\$3.10
VPS Grade 2	\$65.20	\$70.00	\$4.80	7%	\$32.60	\$35.00	\$2.40

Table 6.9: Proposed new fees for Schedule 2 for 2023-24²⁵

Resource	2023-24 Published fee for the first hour or part	2023-24 Proposed fee value	Increase in fee value	Percentage increase	2023-24 Published fee for subsequent ½ hour or part	2023-24 Proposed fee value	Proposed fee increase
Police dogs	\$30.20	\$38.20	\$8.00	26%	\$15.10	\$19.10	\$4.00
Police horses	\$47.70	\$63.60	\$15.90	33%	\$23.90	\$31.80	\$7.90
Police motor car	\$14.30	\$41.30	\$27.00	189%	\$7.20	\$20.70	\$13.50
Police motorcycle	\$14.30	\$22.30	\$8.00	56%	\$7.20	\$11.13	\$3.93
Police bus ²⁶	\$8.00	\$139.90	\$131.90	1649%	\$4.00	\$70.00	\$66.00
Police bicycles	\$4.80	\$15.90 ²⁷	\$11.10	231%	\$2.50	\$7.95	\$5.45
All-terrain vehicles	\$8.00	\$15.90	\$7.90	99%	\$4.00	\$7.95	\$3.95
4WD operational vehicle	NEW FEE	\$70.00	NOT APPLICABLE		NEW FEE	\$35.00	N/A
Utility vehicle	NEW FEE	\$42.90	NOT APPLICABLE		NEW FEE	\$21.50	N/A
Operational vans	NEW FEE	\$109.70	NOT APPLICABLE		NEW FEE	\$54.90	N/A
In Water Vessels – Class 1	\$500.90	\$756.80	\$255.90	51%	\$250.50	\$378.40	\$127.90

²⁵ Note: The fee in fee value and percentage increase has been calculated against an adjusted fee without the charges for personnel. The current Regulations stipulate a fee of police resources including the cost of personnel to operate the resources. Under the proposed Regulations, only the cost of the resources are listed in Schedule 2. The personnel required will be charged for according to Schedule 1.

²⁶ The three police bus sizes have been grouped into a single category.

²⁷ In line with section 8(1) of the Monetary Units Act 2004, fee units have been revised to 1.0 (\$15.90).

(>15 metres) ²⁸							
In Water Vessels – Class 2 (<15, > 10m)	\$346.70	\$659.90	\$313.20	90%	\$173.40	\$330.00	\$156.60
Trailer boats – Class 3 (<10 metres, > 6 metres)	\$244.90	\$257.60	\$12.70	5%	\$122.50	\$128.80	\$6.30
Trailer boats – Class 4 (< 6 metres)	\$47.49	\$84.30	\$36.81	78%	\$23.80	\$42.20	\$18.40
Personal watercraft	\$39.80	\$39.80	\$0.00	0%	\$19.90	\$19.90	\$0.00
Rotary helicopter	NEW FEE	\$9,948.60	NOT APPLICABLE		NEW FEE	\$4,975.10	N/A
Fix wing plane	NEW FEE	\$5,450.50	NOT APPLICABLE		NEW FEE	\$2,725.30	N/A
Drone	NEW FEE	\$143.10	NOT APPLICABLE		NEW FEE	\$71.50	N/A
Counter-Drone	NEW FEE	\$429.30	NOT APPLICABLE		NEW FEE	\$214.70	N/A

Table 6.10: Proposed new fees for Schedule 3 for 2023-24

Item number	Service Category	Service	2023-24 Published fee	2023-24 Proposed fee value	Increase in fee	Percentage increase
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²⁸ Water vessels have been recategorised into classes which group vessels of a similar design and usage and better reflect the evolving nature of Victoria Police’s water policing fleet.

Item 1	National Police Certificate	Search of all relevant police records except fingerprints for volunteers	\$19.70	\$28.60	\$8.90	45%
Item 2	National Police Certificate	Search of all relevant police records except fingerprints for all purposes except volunteering	\$52.50	\$84.30	\$31.80	61%
Item 3	National Police Certificate	Search of all relevant police records including fingerprints	\$205.10	\$225.80	\$20.70	10%
Item 4	Ink-fingerprints	To process and provide one set of ink fingerprints for visa, passport, or immigration purposes, not ordinarily undertaken by police officers in the course of their duty	\$54.10	\$54.10	\$0.00	0%
Item 5	Ink-fingerprints	To process and provide two sets of ink fingerprints for visa, passport, or immigration purposes, not ordinarily undertaken by police officers in the course of their duty	\$76.30	\$76.30	\$0.00	0%
Item 6	Ink-fingerprints	To process and provide three sets of ink fingerprints for visa, passport, or immigration purposes, not ordinarily undertaken by police officers in	\$98.60	\$98.60	\$0.00	0%

		the course of their duty				
Item 7	Electronic fingerprint scanning	To process one set of livescan fingerprints for Victorian private security or firearm licensing purposes	NEW FEE	\$144.70		NOT APPLICABLE
Item 8	Lost, stolen or damaged property	Search of all relevant police records to provide a copy of a crime or a fire report	\$52.50	\$74.70	22.20	42%
Item 9	Lost, stolen or damaged property	Process each subrogation notice provided loss assessors or insurers to advise of change of ownership of property	\$17.50	\$23.90	6.40	37%
Item 10	Collision or accident	Victoria Police can search for and provide a copy of collision or accident report including the first 10 pages	\$57.20	\$82.70	25.50	45%
Item 11	Collision or accident	Additional charges apply for each additional page beyond the first 10 pages	\$1.00	\$1.00 ²⁹	\$0.00	0%
Item 12	Subpoena Documents flat fee - standard	To source and produce the first 10 pages of documents to a court in response to a subpoena	NEW FEE	\$70.00		NOT APPLICABLE

²⁹ The fee for additional pages accounts not only for printing costs but also for time spent by members to source and review documents, which takes those members away from operational duties.

Item 13	Additional pages for report	Refers to the production of subpoenaed documents beyond the initial 10 pages	NEW FEE	\$1.00	NOT APPLICABLE
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6.5 Jurisdictional Comparison

The Victorian Guide to Regulation requires that less onerous approaches in other jurisdictions be considered in the RIS. The proposed fees and charges are therefore compared to other jurisdictions in this section. The jurisdictional analysis yields the following insights:

- As Table 4.8 demonstrates, other officers are the biggest category of police personnel providing services at events in Victoria. The proposed fee of \$117.70 for other ranks is significantly lower than the charges prescribed by New South Wales and Queensland but is higher than the charges in South Australia and Western Australia.
- For the services under Schedule 2, Victoria has the highest charges for helicopters, fixed wing aircraft, and police cars, and is the only jurisdiction to charge for drones. However, the charges for some in-water vessels, jet skis and motorcycles are lower than in New South Wales, which is the only other jurisdiction with these charges.
- The proposed fee and charges for most police information services are comparable to other jurisdictions in Australia. Charges for most of the services place Victoria in the mid-range compared to the other states. The 55 per cent increase in the charge for full fee name checks however places Victoria's charges as the highest amongst the states and the Australian Federal Police (AFP). The newly introduced charges for electronic fingerprints and subpoena documents are lower than in South Australia and New South Wales respectively, which are the only other jurisdictions to provide the respective services.

The following tables contain the jurisdictional comparison of the polices fees and charges by schedule.

Table 6.11: Jurisdictional comparison of police personnel fees and charges at 2023-24 fee values (Schedule 1)

Fee/charge (per hour)	Victoria (proposed fee)	New South Wales	Queensland	South Australia	Western Australia	Tasmania
Officer - per hour	\$227.40	\$175.70	\$162	\$92	-	-
Sub-officer - per hour	\$167	\$144	-	-	-	-
Other officers – per hour	\$117.70	-	-	-	\$115	-

PSO sub-officer – per hour	\$119.30	-	-	-	-	-
PSO other ranks – per hour	\$92.20	-	-	-	-	-
Chief Pilot – per hour	\$211.50			\$110		
VPS Grade 7 per hour	\$225.80	\$165.70	-	-	-	-
VPS Grade 6 – per hour	\$165.40	-	-	-	-	-
VPS Grade 5 – per hour	\$127.20	-	-	-	-	-
VPS Grade 4 – per hour	\$98.60	\$113.80	-	-	-	-
VPS Grade 3 – per hour	\$82.70	-	-	-	-	-
VPS Grade 2 – per hour	\$65.20	-	-	-	-	-

Table 6.12 Jurisdictional comparison of police resources fees and charges at 2023-24 fee values (Schedule 2)

Fee/charge (per hour)	Victoria (proposed fee)	New South Wales	Queensland	South Australia	Western Australia	Tasmania
Police dogs - per hour	\$38.20	\$26.60	-	-	-	-
Police horses - per hour	\$63.60	\$28.00	\$9.40	-	-	-

Police motor car	\$41.30	\$25.90	\$30.95	\$1.05 per km	-	-
Police motorcycle	\$22.30	\$44.40	\$30.95	\$1.05 per km	-	-
Police bus	\$139.90	-	-	By negotiation	-	-
All-Terrain Vehicle	\$15.90	-	-	-	-	-
4WD Operational Vehicle	\$70	\$31.80	-	-	-	-
Utility Vehicle	\$42.90	-	-	\$1.05 per km	-	-
Operational Vans	\$109.70	-	-	\$1.05 per km	-	-
In Water Vessels - Class 1 (≥ 15m)	\$756.80	\$1,145.05	-	-	-	-
In Water Vessels - Class 2 (<15, > 10m)	\$659.90	\$472.25	-	-	-	-
Trailer Boats - Class 3 (≤10, >6)	\$257.60	\$237.85	\$359.90	-	-	-
Trailer Boats - Class 4 (≤6)	\$84.30	-	-	-	-	-
PWC (Personal Water)	\$39.80	\$106.50	-	-	-	-

Craft)/Jet Ski							
Rotary helicopter	\$9,948.60	\$5,814.90	-	-	\$3,351.00	-	
Fix wing aeroplane	\$5,450.50	\$2,530.90	-	\$2,141.00	\$2,376.00	-	
Drone	\$143.10	-	-	-	-	-	
Counter- Drone	\$429.30	-	-	-	-	-	

Table 6.13: Jurisdictional comparison of fees and charges for police information services at 2023-24 fee values (Schedule 3)

Fee/charge	Victoria (proposed fee)	New South Wales	Queenslan d	South Australia	Western Australia	Tasmania	Australian Federal Police
National Police Certificate - Volunteers	\$28.60	\$15	-	\$47.75	\$17	\$5	-
National Police Certificate – Name check only	\$84.30	\$59.70	\$67.90	\$74.50	\$58.70	\$45	\$42
National Police Certificate – Name check and fingerprints	\$225.80	\$206	\$241.15	\$225	-	\$120	\$99
Ink Fingerprints – One set	\$54.10	-	\$37.90	\$154	-	-	
Ink Fingerprints – Two sets	\$76.30	-	-	-	-	-	
Ink Fingerprints – Three sets	\$98.60	-	-	-	-	-	
Lost, stolen or damaged property report – Search of	\$74.70	\$131	\$84.30	\$86.50	\$49.10	\$53.90	

records for crime report						
Lost, stolen or damaged property report – Subrogation notice	\$23.90	\$31.30	\$4.45	-	-	-
Collision or accident report- search of relevant records	\$82.70	\$131	\$76.15	\$86.50	\$49.20	\$53.90
Collision or accident report – additional pages of witness statements in excess of 10 pages, per page	\$1	-	\$4.45	-	-	-
Electronic Fingerprint Scanning	\$144.70	-	-	\$154	-	-
Subpoena Documents Flat Fee - Standard	\$70	\$105.40	-	-	-	-
Additional Pages for Report	\$1	-	-	-	-	-

7. Small business and competition

This chapter assesses the small business and competition impacts of the preferred option.

Small businesses may experience disproportionate effects from regulation for a range of reasons. The possible reasons for this may be that the regulatory requirements apply mostly to small businesses, or because small businesses have limited resources to understand and comply with regulatory requirements compared to larger businesses. Small businesses may lack the economies of scale that allow fixed regulatory costs to be spread across a large customer base.

The Victorian *Guide to Regulation* also requires a RIS to assess the impact of regulations on competition. Regulations can affect competition by preventing or limiting the ability of businesses and individuals to enter and compete within particular markets. In undertaking this assessment, we have considered questions such as:

- Is the proposed measure likely to affect the market structure of the affected sector(s) – i.e. will it reduce the number of participants in the market, or increase the size of incumbent firms?
- Will it be more difficult for new firms or individuals to enter the industry after the imposition of the proposed measure?
- Will the costs/benefits associated with the proposed measure affect some firms or individuals substantially more than others (e.g. small firms, part-time participants in occupations etc.)?
- Will the proposed measure restrict the ability of businesses to choose the price, quality, range or location of their products?
- Will the proposed measure lead to higher ongoing costs for new entrants that existing firms do not have to meet?
- Is the ability or incentive to innovate or develop new products or services likely to be affected by the proposed measure?

An analysis of small business and competition impacts is provided in the following sections. In summary, the proposed regulatory amendments should not have an impact on competition. In addition, the proposed amendments are not expected to have a material impact on small businesses.

7.1 Impact on competition

The preferred option will not have a material impact on competition as the updated fees and charges will apply to all businesses. An increase in police charges for events may pose a barrier to entry for small event organisers. However, the use of the fees and charges in the Regulation is at the Chief Commissioner of Police's discretion. The power to waive fees allows police to exercise discretion in cases where costs may threaten an event's financial viability. One stakeholder noted that depending on the scale of the potential increase of police fees, the additional costs may make it cost-prohibitive for some security license holders to remain in the security industry (see Section B.1.2). However, the potential scale of this impact is currently unknown. DJCS welcomes any and all input from stakeholders regarding the extent to which they

anticipate the proposed increase in police fees may anticipate their ability to remain in the security industry.

7.2 Impact on small businesses

Smaller event organisers could be disproportionately impacted by the increase in fees and charges for police attendance at events. Stakeholders consulted noted that police costs can constitute up to 20 per cent of an event's cost. Therefore, an increase in police fees for events can increase costs significantly for small event organisers. The effect of the increase may be mitigated to a certain extent by Victoria Police's fee waiver policies in instances where police costs can threaten an event's financial viability.

It is acknowledged that, particularly in the context of the legislative amendments coming into effect in early 2024 which will give Victoria Police the authority to charge for policing services outside an event venue, stakeholders are uncertain about the impact that these fees may have on their events. DJCS will monitor the impact of the fees on events (see section 8.1.4), including any disproportionate impacts on small businesses.

Increases in costs for information services such as National Police Certificates may disproportionately impact small businesses as they have relatively fewer resources compared to larger businesses, noting that the increase in the fee is \$31 and is unlikely to pose a substantial increase in costs in general.

8. Implementation and Evaluation

8.1 Implementation

The proposed Regulations will remake the existing Victoria Police (Fees and Charges) Regulations 2014, with the amendments considered in the RIS. Based on the analysis conducted in the RIS, Victoria Police is recommending remaking the Regulations with minor amendments to the fee schedule. Victoria Police will primarily be responsible for implementation of the proposed changes. They will continue to have ongoing engagement with impacted stakeholder groups across Victoria through processes such as updates to the Victoria Police website, media releases, and communications with key representative groups from impacted stakeholders.

The proposed Regulations and this RIS are subject to a 28-day public consultation period, which will provide an opportunity for key stakeholders and members of the general public to comment, consider the proposed Regulations and provide feedback. At the conclusion of the public comment period, DJCS will review and consider each submission, and take account of the feedback on both the proposed Regulations and the RIS in finalising the Regulations. DJCS intends for the proposed Regulations to commence in early 2024.

On behalf of the Victorian Government, DJCS will prepare a formal Response to Public Comment document which will detail the comments provided in the public comment submissions and a response to those comments.

The Office of the Chief Parliamentary Counsel will then review and settle the proposed Regulations which will be submitted to the Minister of Police for approval as the Minister responsible for the Victoria Police (Fees and Charges) Regulations.

8.1.1 Summary of implementation tasks

As the Proposed Regulations introduce relatively minor changes from the current Regulations, it is expected that existing approaches to implement the Regulations will continue. Victoria Police will be responsible for administering the proposed Regulations.

8.1.2 Communication

DJCS will give notification of the response to the public comment submissions received during the public consultation period on internet sites accessible to all Victorians at www.publicnotices.vic.gov.au and www.engage.vic.gov.au. DJCS will also publish notifications through channels such as the Victorian Government Gazette, www.publicnotices.vic.gov.au and www.engage.vic.gov.au upon the Minister approving remaking the Regulations and upon the proposed Regulations being in place.

8.1.3 Victoria Police internal reviews

Victoria Police has operational resources dedicated to helping persons or businesses understand the imposition of the Regulations and how they may apply for waiver relief. Victoria Police is currently undertaking a review and update of existing policies, owned by the State Emergencies and Support Command (SESC). As part of this review Victoria Police is also determining its policy position regarding how it will exercise the new legislative head of power to charge fees for services outside an event venue. Victoria Police note that the publication of any updated policies will coincide with the commencement of the new Regulations.

Other relevant policy instruments and communications will be updated to ensure all relevant information, such as the incorporation of planning fees, is current and supports internal stakeholders in adapting to the new Regulations. In addition, SESC is also developing an update to the current cost waiver application process as Victoria Police anticipates the regulations will lead to an increase in requests for waivers from external stakeholders. It is therefore timely to evaluate current processes and introduce changes that improve the quality of submissions from stakeholders and allow for more flexibility and transparency in what factors are to be considered in relation to cost waivers.

8.1.4 Monitoring, enforcement and compliance

Monitoring of implementation, including identification and management of implementation risks, including the impact of charging fees for services outside an event venue, will be undertaken by Victoria Police. Victoria Police will also be responsible for enforcing and administering the proposed Regulations. Given the minor amendments to the Regulations, Victoria Police will not be required to alter the use of existing enforcement and compliance systems to enforce the proposed Regulations.

8.2 Evaluation

Given the estimated impact of the proposed fees exceeds \$8 million per year, the Guide to Regulation requires a midterm evaluation of the proposed Regulations (3 – 5 years from initial implementation).

DJCS will evaluate the proposed Regulations in respect to their overarching objective of recovering, as far as possible, the cost of police personnel deployed to provide the service for which fees are imposed in the Regulations. This will be informed by information provided by Victoria Police.

Victoria Police, through SESC, will monitor stakeholder feedback and escalate concerns where necessary. As mentioned in section 8.1.3, Victoria Police is expecting an increase in waiver applications, including for events for which waivers have not formerly applied.

To monitor the impacts and effectiveness of the proposed Regulations and address challenges as they arise, SESC will be compiling a monthly report identifying ongoing and future risks, outlining key stakeholder feedback and relevant reports, so that items may be escalated accordingly.

Appendix A Current fees prescribed by the Regulations

A full list of the current fees prescribed by the Regulations are outlined in 0 – A.3. The value of fees is calculated at the 2023-24 value of a fee unit at \$15.90.³⁰

Table A.1: List of charges in Schedule 1 of the Regulations

Personnel	Fee for first hour or part (Fee unit)	Fee for first hour or part (Fee value)	Fee for subsequent half hour or part (Fee unit)	Fee for subsequent half hour or part (Fee value)
Officer	11.6	\$184.44	5.8	\$92.22
Sub-officer	8.7	\$138.33	4.35	\$69.17
Other ranks	6.8	\$108.12	3.4	\$54.06
VPS Grade 7	12.7	\$201.93	6.35	\$100.97
VPS Grade 6	9.8	\$155.82	4.9	\$77.91

³⁰ Department of Treasury and Finance (2023), 'Indexation of fees and penalties.' Accessed at <https://www.dtf.vic.gov.au/financial-management-government/indexation-fees-and-penalties>

VPS Grade 5	7.5	\$119.25	3.75	\$59.63
VPS Grade 4	6.3	\$100.17	3.15	\$50.09
VPS Grade 3	5.3	\$84.27	2.65	\$42.14
VPS Grade 2	4.1	\$65.19	2.05	\$32.60
VPS Grade 1	3.5	\$55.65	1.75	\$27.83

Table A.2: List of charges in Schedule 2 of the Regulations

Service	Fee for first hour or part (Fee unit)	Fee for first hour or part (Fee value)	Fee for subsequent half hour or part (Fee unit)	Fee for subsequent half hour or part (Fee value)
Police dogs	2	\$31.80	1	\$15.90
Police horses	3	\$47.70	1.5	\$23.85
Police motor car (including 1 crew)	7.7	\$122.43	3.85	\$61.22
Police motorcycle (including 1 crew)	7.8	\$124.02	3.9	\$62.01
Small police bus (including 1 crew)	7.4	\$117.66	3.7	\$58.83

Service	Fee for first hour or part (Fee unit)	Fee for first hour or part (Fee value)	Fee for subsequent half hour or part (Fee unit)	Fee for subsequent half hour or part (Fee value)
Medium police bus (including 1 crew)	7.8	\$124.02	3.9	\$62.01
Large police bus (including 1 crew)	8.5	\$135.15	4.25	\$67.58
Police bicycles (including 1 crew)	7.1	\$112.89	3.55	\$56.45
All-Terrain vehicles (including 1 crew)	7.4	\$117.66	3.7	\$58.83
Personal watercraft (including 1 crew)	9.3	\$147.87	4.65	\$73.94
Police motorboat of 5 metres or less (including 1 crew)	9.4	\$149.46	4.7	\$74.73
Police motorboat of 5 metres or less (including 2 crew)	16.6	\$263.94	8.3	\$131.97
Police motorboat of 6 metres or more with a single engine (including 2 crew)	22.9	\$364.11	11.45	\$182.06

Service	Fee for first hour or part (Fee unit)	Fee for first hour or part (Fee value)	Fee for subsequent half hour or part (Fee unit)	Fee for subsequent half hour or part (Fee value)
Police motorboat of 6 metres or more with a twin engine (including 2 crew)	22.8	\$362.52	11.4	\$181.26
Police motorboat of 7.4 metres or more with a twin engine (including 2 crew)	29	\$461.10	14.5	\$230.55
Police motorboat of 10 metres or more (including 2 crew)	35.4	\$562.86	17.7	\$281.43
Police motorboat of 12 metres or more (including 2 crew)	45.1	\$717.09	22.55	\$358.55
Helicopter light twin (including 2 crew)	295.4	\$4,696.86	147.7	\$2,348.43
Helicopter medium twin (including 3 crew)	490.7	\$7,802.13	245.35	\$3,901.07

Table A.3: List of charges in Schedule 3 of the Regulations

Item	Service Category	Service	Fee unit	Fee Vale
Item 1	National Police Certificate	Search of all relevant police records except fingerprints for volunteers	1.24	\$19.72
Item 2	National Police Certificate	Search of all relevant police records except fingerprints for all purposes except volunteering	3.3	\$52.47
Item 3	National Police Certificate	Search of all relevant police records including fingerprints	12.9	\$205.11
Item 4	Ink-fingerprints	To process and provide one set of ink fingerprints for visa, passport, or immigration purposes, not ordinarily undertaken by police officers in the course of their duty	3.4	\$54.06
Item 5	Ink-fingerprints	To process and provide two sets of ink fingerprints for visa, passport, or immigration purposes, not ordinarily undertaken by police officers in the course of their duty	4.8	\$76.32
Item 6	Ink-fingerprints	To process and provide three sets of ink fingerprints for visa, passport, or immigration purposes, not ordinarily undertaken by police officers in the course of their duty	6.2	\$98.58
Item 7	Lost, stolen or damaged property	Search of all relevant police records to provide a copy of a crime or a fire report	3.3	\$52.47

Item	Service Category	Service	Fee unit	Fee Vale
Item 8	Lost, stolen or damaged property	Process each subrogation notice provided loss assessors or insurers to advise of change of ownership of property	1.1	\$17.49
Item 9	Collision or accident	Victoria Police can search for and provide a copy of collision or accident report including the first 10 pages	3.6	\$57.24
Item 10	Collision or accident	Victoria Police can search for and provide a copy of collision or accident report including the first 10 pages	-	\$1

Appendix B Stakeholder consultation summary

Consultations with event organisers and government agencies involved with events were undertaken to provide stakeholders an opportunity to contribute feedback on the proposed Regulations and to understand the impact police fees and charges can have on events. Deloitte worked with DJCS and Victoria Police to identify stakeholders for consultations. Deloitte conducted workshops to gain an in-depth understanding of the potential burdens placed on the events industry by the proposed Regulations and to identify any areas of potential concerns.

Two stakeholder groups for police information services provided written feedback.

Workshops were conducted with the following participants:

- Department of Jobs, Skills, Industry and Regions
- Creative Victoria
- Visit Victoria
- Melbourne and Olympic Park Trust
- Melbourne Cricket Club
- Marvel Stadium
- Kardinia Park
- Cricket Australia
- Australian Grand Prix Corporation
- A-League
- Australian Festival Association
- Untitled Group
- Eventiv Australia
- G4S
- GPSafety

B.1. Common themes and findings from stakeholder consultations

B.1.1. Police costs form a significant component of event costs and administrative effort

Stakeholders noted that police charges form a significant part of the total cost of running an event in Victoria. One stakeholder stated that police cost can comprise up to 20 per cent of an event's total cost. Another stakeholder stated that for certain events, police costs per attendee can be higher than other costs associated with the event such as cleaning and maintenance. One stakeholder noted that policing costs can hamper the competitiveness of Victoria as a venue to host events. However, stakeholders also acknowledged that Victoria provides advantages for event organisers such as the size of the market and available infrastructure

compared to other jurisdictions. This can temper the effect of a potential increase in police costs.

B.1.2. Police costs can be significant for users of police information service

One stakeholder noted that police costs, and consequently any increases to police costs, will have a greater impact on users employed in professions (e.g. employed as a base level security guard or a crowd controller) as opposed to those at higher levels (e.g. supervisors or security advisors) due to the salary differential. The stakeholder also stated that many base level licence holders may consider additional fees as a deterrent to remaining in the industry.

Another stakeholder noted the jurisdictional disparity and differences in requirements for security licenses. For instance, some jurisdictions may require an ink fingerprints and others might require a Livescan and name check. Therefore, costs may be prohibitive if a user is required to undertake multiple checks. As discussed in section 6.5, the proposed fees for the electronic fingerprints are lower than in South Australia which is the only jurisdiction to charge this fee. While outside the scope of the Regulations themselves, the stakeholder noted that using the fingerprints already on file rather than requiring multiple checks can create efficiencies and reduce costs.

Both stakeholders agreed with the addition of a separate fee for Livescan, albeit at a lower cost than ink fingerprints given the lower time and effort involved.

B.2. Stakeholder feedback on factors beyond the scope of Regulations

B.2.1. Transparency in risk assessment and/or the nature of and rationale for personnel and resources deployed

A common point of feedback raised in the consultations was that transparency regarding the level of police personnel and resources that are allocated by Victoria Police for an event was seen as a critical consideration for stakeholder. This consideration was of significant importance to stakeholders both in planning for and budgeting events, and in terms of their views of the risk profile of their events relative to their impressions of Victoria Police's perception of the risk profile of a given event. Some stakeholders consulted also indicated that the current invoicing system can be complicated to understand. Further, event organisers would not know the full cost of police services until after the event as the invoice is based on the actual services provided. According to stakeholders, this uncertainty can make it hard for them to estimate the total cost of their event.

While stakeholders did not query the prescribed cost of police personnel and resources outlined in the Regulations, stakeholders stated that they did not have visibility over the decisions made by Victoria Police about personnel and resource allocation to the event which contribute to the total cost that event organisers are liable to pay. Stakeholders acknowledged that while Victoria Police's risk assessment procedures are confidential, they present a barrier to clearly understanding the police costs incurred for events. Stakeholders believe that the administration of the fee, rather than the fees themselves, pose a greater potential impact on their events and their customers. Another common point of feedback from stakeholders was that they would welcome the opportunity for greater collaboration and involvement in decision making process regarding the number of police personnel deployed at an event.

Stakeholders stated that an important consideration for Option 2 (charging a fee based on an event's risk classification) would be the extent to which the classification criteria is clearly

communicated and explained to event organisers. Stakeholders also noted that while in principle Option 2 might offer some improvement in simplicity if events were able to be readily and reliably assigned in advance to specific risk categories, in practice there were already often differences in the perspectives of Victoria Police and event organisers regarding the relative risk categories, and so stakeholders would generally prefer the ability to discuss and assess risk on a case-by-case basis.

B.2.2. Charging for police services outside an event venue

This amendment is out of scope for the Regulations but was a consistent point of feedback from the consultations, and the way in which the power to charge fees for services outside an event venue may be used in future was of significant concern to stakeholders. Many stakeholders raised questions about how this power would be used in practice, and how its use would impact the costs they would incur for police services. Some stakeholders also asked questions about the extent to which there were viable alternatives to some services offered by police outside a venue, with one stakeholder noting that while private security could be used to mitigate the need for police in areas outside the venue, private security guards do not have the same level of authority that police do. Stakeholders generally expressed an interest and willingness to work closely with Victoria Police in determining the appropriate use of this power. Victoria Police state that stakeholders will be consulted and that Victoria Police intends to publish any updated policy position regarding the use of this power at the same time as the commencement of the Regulations.

Limitation of our work

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