

The Ministry for Police  
Level 19  
Avery Building  
14-24 College Street  
Darlinghurst  
NSW 2010

Dear Sir,

Members of the AIPD have held a number of meetings in relation to the Issues Paper regarding the National Competitive Policy Review for the Commercial Agents and Private Inquiry Agents Act 1963, as issued by the Ministry for Police.

Please find below the submission of these meetings of the members of the AIPD, these are the comprehensive view of our members.

### **AIPD Submission on the NCP Issues Papers**

#### **The objectives of the Act.**

- 1. Does this objective remain valid today?**
  - a, The consensus is yes that it does in relation to paragraph 4 page 8. Although the speech to the parliament was in 1955 things have changed dramatically since then.
  
- 2. Is the objective being met?**
  - a, There are two basic answers to this and that is yes the AIPD believes the majority of the people in the industry are striving to be professional and have the highest order of integrity, however the existing licensing regime is inadequate to regulate to ensure the highest standards are maintained.
  - b, The AIPD and its members are aware of some licence holders who have the ability to and are bringing the Industry into disrepute because they don't have the ethical standards that the members of the Institute have. The AIPD members are bound by the Code of Ethics as set by the Executive.
  - c, It doesn't provide a licensed operator with the framework for greater competition compared to unlicensed operators or users demands in terms of improved quality, requires access to information, it is not provided for in the existing legislation.

- 3 If the legislation is to be retained what ought to be the expressive objective or objectives of the legislation?**
- a, The AIPD Draft Bill provides a way to maintain and regulate standards, not only licensing but also training quality standards. It also provides mechanisms that allow a greater competitive framework by ensuring investigators have access to information that allows them to improve the quality of information they are providing to the consumer and are getting greater value for their money, and thus better investigative results.

### **Rationale for Regulation.**

- 1. To what extent do the identified risks exist today?**
- a, The consensus would be that they all still exist today. However the existing framework hasn't satisfactorily addressed those risks despite being in operation for 38 years.
  - b, On the risks to the economy, the risks to commercial concerns, the business generally and to individuals being defrauded. Members of the AIPD note that around the NSW Police Stations there are signs that indicate the great cost of motor vehicle theft to the community. Better regulation and access to information should in the long term reduce this cost.
  - c, An additional risk is that people are not getting adequate legal representation in matters before the Civil and Criminal jurisdictions?
  - d, The AIPD Draft Private Investigators Bill which addresses (nearly) all of these issues and has been extensively researched by the Private Investigation Industry over the last 8 years
- 2 Should private enquiry agents be licensed?**
- a, There should be no licencing in relation to private inquiry agents but Investigators should be issued with a Practicing Certificate once they can demonstrate to the relevant authority that they are competent to practice on the public.
  - b, It is proposed and this should include specific training in specific expert areas such as arson, intellectual property, defamation, family law, criminal, repossessions, debt collections etc.
  - c, There would be endorsements on the practicing certificates which would be issued on having attended specialised training courses to qualify them in those specialised areas.

### **Restrictions imposed by the specific licensing criteria under the Commercial Agents and Private Enquiry Agents legislation.**

- 1 Are the definitions used in the legislations appropriate?**
- a, The answer is no. There should be one definition and that should be Private Investigator.
  - a, We refer to the previous section on issues that investigators should have endorsements on their licence for specific specialised areas of investigation as previously stated, see 2 b above

- 2 **Are the existing licensing categories appropriate?**
- 3 **Should the categories of licence remain separate or be merged?**
  - a, Two and Three have been answered in the previous section. As long as they have been deemed competent by a relevant authority to practice on the public.

### **Exemptions**

- 1 **Are the current exemptions appropriate and justifiable?**
  - a, There needs to be a lot further discussion on this point as it would depend on a number of factors such as why should investigators in government departments be exempt from training and qualifications when there is a matter of public interest. The AIPD believes that all persons engaged in the investigation area must all be properly qualified, this includes the public, private and commercial areas
- 2 **Have problems been experienced with the activities of these groups?**
  - a, Yes, see 1 a above
- 3 **Are the current alternate control arrangements (i.e. legislation under which they operate) sufficient?**
  - a, The answer is no. We believe that the ICAC report in relation to skip tracers employed by large commercial and financial institutions can be as much in need of regulation as agents who offer their service to the community generally.
  - b, This we believe should apply to even government departments that investigate matters, serious matters either in the criminal or civil matter, dealing with public monies should be seen to be investigated on an independent basis as opposed to the possibility of political influence on an investigator within a government department. This is most essential for the probity of the department and any investigation.

### **Fees**

- 1 **Do you consider that the prescribed fees constitute a significant barrier to entry?**
- 2 **Do you consider that the subscribed fees in any way discriminate as between licenses?**
- 3 **Do you consider that these fees reflect the administrative and other costs regulating the industry?**
- 4 **Do you consider that the licenses should be photo-licences?**
- 5 **What are the costs and benefits associated with annual licence renewals?**
  - a, It was deemed best to answer these questions in a consolidated form as follows.
  - b, we do not believe the fees are discriminatory to various classifications. They reflect the service that we get from the government in relation to our industry (which is basically non-existent at this stage).

- c, We are not in a position to make a judgement on the administrative costs or other costs for regulating the industry, currently there appears to be no regulation of the industry to give any guide lines for assessment.
- d. The existing fee structure doesn't constitute a significant barrier nor does it seem to discriminate between various licences. However the Industry system laid down in the Act as it stands we believe to be very inefficient because it is based on an annual renewal system, paper based through the local courts, requiring an annual photo licence.
- e. We feel that photo licences (Practicing Certificates) are appropriate.
- f. Five year licences would be appropriate if the industry was run by the government, but if the industry were to control itself, or co-regulation or a control board then yearly Practicing Certificates would be paramount.

### **Fidelity Bond.**

- 1 Is the Fidelity Bond requirement appropriate and/or effective?**
- 2 Does the amount of the Fidelity Bond represent the sums of money handled by Commercial Agents?**
- 3 To what extent does the amount of Fidelity Bond reflect the risk posed by commercial agents to their clients?**
- 4 Are there any problems in practising in obtaining the Fidelity Bond from insurance companies?**
- 5 Are there preferable ways of achieving the financial requirements?**
  - a, It is our submission that as it currently stands the Fidelity Bond is probably adequate, however we are not aware of any substantial fraud in relation to commercial agents of any substantial nature over the last 5-10 years.
  - b, Should new legislation be passed then we would refer to the ICAC recommendations in relation to skip tracers etc having to be licensed.
  - c, We would support imposing compulsory insurance requirements on commercial agents and/or private enquiry agents and/or establishing a centralised industry compensation fund, professional indemnity fund, or fidelity fund.
  - d, Consideration must be given to in-house investigations and in-house commercial agents. If central funds as indicated in c, above were implemented then the problem would be solved.

### **Grounds of Objection to the Grant of a Licence**

- 1 If licensing is preferred option what are the appropriate grounds for objection?**
- 2 Are the licensing criteria strict enough to prevent higher risk individuals operating in the industry?**
- 3 What are the costs and benefits associated with each of the licensing criteria?**
- 4 Is the age requirement an appropriate licensing requirements?**
- 5 What are the costs and benefits of the requirement for applicants to have been continuously resident in Australia during the period of 12 months immediately preceding the making of the application?**
- 6 Is a fit and proper person criteria appropriate?**

- 7 **Is the requirement to be of good fame and character and appropriate licensing criteria?**
- 8 **Should the legislation more clearly define the type of offences that may or must be disqualify an applicant from obtaining a licence?**
- 9 **If so, what should be the disqualifying offences?**
- 10 **Should agents be required to obtain set qualifications or demonstrate competency standards?**
- 11 **Are the existing qualification requirements appropriate?**
- 12 **Should the achievement of these qualification standards be mandatory or remain a matter of discretion for the licensing authority?**
- 13 **Should there be suppliers of courses other than TAFE?**
- 14 **Should financial threshold requirement supported by constraints on persons who are bankrupt or directors that have wound up companies from being licensed be introduced?**
- 15 **Should there be a special provision to deal with applications from former police officers?**
- a, In relation to 1-9 discussion points we would refer to Section 37 of the Draft Private Investigators Bill, **“Professional Misconduct”**. This section we feel would be appropriate to cover the points as previously listed. This would be for the grounds of objections to the grant/reissue/continuation of a Practicing Certificate.
- b, Point 10. We would refer to Section 13 of the AIPD Draft Private Investigators Bill. **“Requirement of a course of education”**.
- c, Point 11. The answer is no
- d, Point 12. Again we would refer to Section 13 in b, above and we also support the recommendations of the Training Committee Working Party. This should be at the discretion of the central body responsible for setting the training curriculum and it must be stressed that the same standards and curriculum must be applied across the whole industry not ad hoc.
- e, Point 13. The answer is that yes as long as they are using the same curriculum as issued by the central control body.
- f, Point 14. We would suggest that the new regulation imposed by the Bar Association in relation to bankrupt barristers for the issuing of practising certificates would be appropriate.
- g, Point 15. Our submission is that they should be treated in the first instance in the same way that all other applicants are treated but however we would also refer to Section 20 in the Draft Private Investigators Bill **“Commissioner of Police to provide assistance”**.

### **Restrictions on competitive conduct**

- 1 **Do these conduct restrictions achieve a good purpose?**
- 2 **Do they produce any benefit to clients and/or general community?**
- 3 **Are these restrictions necessary for the protection of consumers?**
- 4 **Are these restrictions effective?**
- 5 **Are these conduct restrictions enforced?**
- 6 **Are they appropriate for modern conditions?**
- 7 **To what extent do these requirements restrict competition?**
- 8 **What are the compliance costs associated with these conduct requirements?**

- 9 **Do the costs outweigh the benefits incurred by the conduct restrictions?**  
 10 **Should the conduct prescribed by Section 39C be broadened, if so, what**  
 11 **other forms of conduct should be described as “harassment”?**  
 11 **Do they unnecessarily duplicate provisions under general criminal law or**  
 12 **fair trading laws?**  
 12 **Are the existing grounds for suspension, cancellation or refusal to renew a**  
 13 **licence appropriate?**  
 13 **Should any of these grounds be removed or should any further grounds**  
 14 **be added?**  
 14 **Are there any other offences or conduct restrictions that should be added**  
 15 **or removed?**  
 15 **Are the prescribed penalties for these offences appropriate?**  
 a, It is our submission that the discussions points under these headings can all  
 be referred and covered by a code of conduct and we refer you to the  
 provisions of the “**Professional Misconduct**” qualifications in Section 37  
 of the AIPD Draft Private Investigators Bill.  
 b, Matters of harassment could be simply complied with in relation to those  
 harassment sections in other comparative legislations. (Example – Section  
 60 of the Trade Practices Act 1974 together with the provisions laid down  
 in relation to harassment as outlined in the ACCC rulings).

### Administration of the legislation

- 1 **What agency or agencies should have responsibility for the**  
 2 **administration of the legislation?**  
 2 **How effective are the existing regulatory processes?**  
 3 **How efficient are the existing regulatory processes?**  
 4 **Who should be entitled to object to the grant of a licence?**  
 5 **Should there be a mandatory public reporting requirement to alert the**  
 6 **public to the fact that either an application has been made or a licence**  
 6 **has been granted to a particular firm or individual,**  
 6 **Do the existing regulatory processes incorporate adequate dispute**  
 6 **resolution procedures?.**  
 a, It is our submission that the only body that should have administrative of  
 the legislation should be the Attorney General. The reasons for this are that  
 the police would be inappropriate as the police would have and still have a  
 perceived bias in relation to any competition from private investigators to  
 the police.  
 b, It was the recommendation of the ICAC Commissioner that the police have  
 nothing to do with the Private Investigation Industry and that the other  
 organisations such as the Minister for Justice we don’t think the proper  
 authority to administer the industry nor would the Department of  
 Consumer Affairs in relation to these matters.  
 c, It must be with the Attorney General because of the very nature of the  
 matters that are handled by private investigators which are consistently  
 within the civil and criminal jurisdictions.  
 d, It is also our submission that the industry should the government come to  
 the conclusion that it should be self-regulatory under a control board and  
 the minister should be the Attorney General in the same manner as the

Legal profession this would be the appropriate department in a similar manner as the legal profession.

- e, The Ministerial responsibility for any legislation in relation to private investigators must and should be the Attorney General to eliminate any perceived bias on behalf of the public. (See annexure in relation to the poll conducted in six electorates in '99).
- f, We understand the Police Royal Commission also made recommendations that the police should have nothing to do with the Private Investigation industry. (see summary in the latter half of this submission)

### **Costs and benefits of restrictions on competition imposed by the legislation.**

- 1 What other costs and benefits of the current regulatory scheme are there?**
- 2 To what extent, if at all, do the benefits of the restrictions imposed by the regulatory scheme outweigh the benefits to the community as a whole?**
  - a, It is our submission that there are some costs and benefits, however the costs can not be assessed by us as we do not have access to such information.
  - b, The Institute feels that by suitable modification of that scheme there are additional benefits that would accrue to the community.
  - c, These would include matters of fairness before the courts and equal justice. Additional funds to the government for regulatory access to information necessary for the procedures and fairness before the courts of information from government departments. These we believe are in answer to the National Competition agreements objectives of fairness and competitiveness.
  - d, There are approximately 283,000 people a year going before the courts in NSW, we don't have the break down of the criminal or civil matters but in nearly all matters most of the public do not get a reasonable fair go in representation of a defence or prosecution cases on their behalf before the courts, both civil and criminal.
  - e, We believe any proposed legislation or National Competition Policy giving selected industry members access to these sorts of things will ensure an open fairness and equality before the law.
  - f, We believe that the benefits to the public, civil, corporate and criminal area's will far outweigh any costs.

### **Alternatives**

- 1 Is the regulation a viable option for either private enquiry agents, process servers, repossession agents, debt collectors of the industry as a whole?**
- 2 What are the costs and benefits of deregulation of commercial agents and private enquiry agents industry wholly or in part?**
- 3 What would be the impact of deregulation in terms of industry behaviour and/or public safety?**
  - a, It is our submission that deregulation is not an option. It is because of the nature of the industry it must be regulated, properly monitored and administered by professionals who have expertise within the industry.
  - b, Without regulation the public would be like lambs to the slaughter.

## **Self-Regulation or Co-Regulation**

- 1 Is the commercial agents and private enquiry agents industry capable of self-regulating?**
- 2 Is co-regulation a viable option for regulating the industry?**
- 3 What are the costs and benefits of self-regulation in the industry?**
- 4 What are the costs and benefits of co-regulation?**
- 5 To what extent would either self-regulation or co-regulation meet the objectives or the legislation?**
  - a, The Institute’s submission is that self-regulation is the ultimate aim, however for an interim period it is our submission that co-regulation in the form of a control board be set up with the ultimate aim after a proving period that the Industry can move to self-regulation such as in a similar situation as the Law Society and other industry bodies including the Chiropractor and Osteopaths industry, the Real Estate industry and also the Accounting profession.
  - b, On the co-regulation aspect, it would be proposed that the monies for the administration and running of the industry be self-funded by members of the Industry. In a similar fashion as the abovementioned organisations currently practice.
  - c, And we repeat our previous submission that benefits to the government would be in the form of access fees to various government departments, in a similar fashion as Freedom of Information legislation.

## **Codes of Practice.**

- 1 Should the commercial agents and private enquiry industry be subject to a code of conduct?**
- 2 Should the code be voluntary or mandatory?**
- 3 Is a code of conduct sufficient in itself to regulate the industry or should it be a supplement to other forms of regulation?**
- 4 What are the costs and benefits of instituting a code of conduct?**
- 5 To what extent does a code of conduct achieve objectives of the legislation?**
  - a, It is our submission that a code of conduct be an essential plank of the controlling body, (see section 37 Draft Private Investigators Bill “Professional misconduct”).

## **Negative licensing**

- 1 Is negative licensing a viable option for regulatory the commercial agents and private enquiry industry?**
- 2 What are the costs and benefits of the negative licensing?**
- 3 To what extent does negative licencing achieve the objects of the legislation?**
  - a, It is our submission that negative licensing would be repugnant to the industry as it would open it up to unscrupulous operators to play upon the unsuspecting public.



- b, Cost to all involved could be horrendous, including investigations, courts and administrative costs.

### **Registration**

- 1 Is registration a viable option for regulating the commercial agents/private enquiry industry?**
- 2 What are the cost and benefits of registration?**
- 3 To what extent does a registration system achieve the objects of the legislation?**
  - a, It is our submission that the existing system of registration has not served the interests of the legal profession, the commercial sector nor members of the public and the community as a whole.

### **Certification**

- 1 Is certification a viable option for regulating the commercial agents/private enquiry industry?**
- 2 What are the costs and benefits of certification?**
- 3 To what extent does certification achieve the objectives of the legislation?**
  - a, It is the AIPD's submission that certification as an option in relation to the industry would not be of benefit to the industry users such as the insurance industry, the general public, the commercial industry and the legal profession.
  - b, We have previously indicated a form of accreditation on the endorsements of a Practising Certificate for specialised areas (where additional education and training had been undertaken for these specific areas).

### **National Competition Policy Agreements**

Having perused the National Competitive Policy Agreements and in particular the section referring to "Reforming the Professions" and "National Competition Policy - An Overview", we have listed below the important points that we believe affect our industry.

- 1 Reforming the professions**
  - a. Legislation**
  - b. Self regulation**
  - c. Independent authority**
  - d. Market mechanisms**
  - e. Laws, co-regulation and self-regulation**
  - f. Why should professions compete?**
  - g. State borders - restricting competition**
  - h. Why shouldn't professionals advertise**
  - i. Things to consider**
    - (1) The potential for possible harm that may result from poor practice.
    - (2) The capacity of the profession to effectively regulate itself.
    - (3) The opportunities for co-regulatory arrangements.
    - (4) The costs of a fully government controlled regulatory system.

- (5) The ability of government to manage a regulatory system
- j. Regulation should be kept to a minimum and place the onus of proof on those who argue for restrictions.**
  - (1) The objectives of the regulation are clear.
  - (2) Any restrictions on entry or practice have a demonstrable link to reducing harm.
  - (3) Rules are transparent and public.
  - (4) Enforcement action is open, accountable and consistent.
  - (5) There is strong community involvement in decision making.
  - (6) Regulation is the minimum necessary to achieve the objectives
- k Professions and National Competition Policy.**
  - (1) One of the most important National Competition Policy undertakings is that each Government will review and reform all laws that restrict competition unless the benefits of the restriction to the community as a whole outweigh the costs.
  - (2) Anti-competitive restrictions and regulations on the professions must be comprehensively reviewed by the Commonwealth and all State and Territory Governments and reformed if they are found not to be in the public interest.
- l The public interest.**
  - (1) Laws and policies relating to matters such occupational health and safety, industrial relations, access and equity.
  - (2) The interests of consumers generally or of a class of consumers
- m What is competitive neutrality?**
  - (1) Competitive neutrality involves removing any unfair competitive advantage or disadvantage that Government businesses may experience, simply as a result of Government ownership.
  - (2) Competitive neutrality allows privately owned businesses to compete with Government owned businesses on an equal footing.
  - (3) Exposing Government businesses to competition from the private sector encourages them to improve their business practices and value for money, minimising the need for the use of taxpayer's resources.

**Lack of competition creates monopoly, causes abuse, causes corruption**

The above is amply demonstrated by the findings of the Police Royal Commission and the Police Integrity Commission.

It is our submission that one of the main causes of abuse and corruption has been because there has been no competition with the Police. Should competition with the Police be allowed we are certain that abuse and corruption in the police will be dramatically reduced by the removal of their monopoly in criminal matters.

Competition from Private Investigators to the NSW Police Service will be in the public interest, morally, ethically and financially and will give access by Private Investigators on behalf of their clients (private and public) and will ensure equality before the law and equal justice.

Whilst the NCP'S do not advocate outsourcing as such, it must be considered in the light of cost effectiveness to the Government minimising the need for use of taxpayers' resources.

It is our submission that the anti-competitive restrictions and regulations on the Private Investigation profession are not in the public interest and must be rectified.

It is our comprehensive submission that the AIPD Draft Private Investigators Bill as posted on our web site [www.aipd.com.au](http://www.aipd.com.au) answers all of the requirements in submissions on NCP Issues Papers **1 a-m** inclusive.

It must be remembered that probably 70% to 80% of all Private Investigators are ex-police. Are we to understand that the Government or the NSW Police Service has now decided that these experienced officers are not capable or qualified to practice as Private Investigators and to accept briefs from the NSW Police Service to conduct investigations?

### **Summary**

Due to the findings of the ICAC in 1992 volume 1 page 132 headed recommendation 3 and we quote as follows:- **“Involvement of the police should not include management of a registry, or of the industry generally. It should be limited to their proper role of investigation and crime prevention and detection”**.

It is the submission of the AIPD that the Police should not have any association with the Private Investigation industry.

Again on page 133 headed:- **Conclusion** and we quote as follows:- **“The industry may be able to contribute to the programme of management proposed, but that could not be achieved at this time through the existing industry associations. They are too steeped in the old culture. As with all industries, the goal should be maximum participation by the industry itself and by consumer groups. But this industry at this time, by reason of its nature and its recent history needs external control. The fitness of many who engage in it should be reviewed”**.

The industry has moved on since 1992 (ICAC report) and the industry is now quite capable and desires to eventually administer itself after the preferred option of Co-Regulation through the medium of a Control Board as per the AIPD Draft Private Investigators Bill.

The AIPD as an industry body was first incorporated in January 1992 and the Draft Private Investigators Bill was first put together in April 1993 in answer to the ICAC report of August 1992.

We refer to the Human Rights and Equal Opportunity Commission Act of 1986 schedule 2 **“International Covenant of Civil and Political Rights”** article 14.1 states:- **“all persons shall be equal before the Courts and Tribunals”** and further 14.2 **“everyone charged with a criminal offence shall have the right to be presumed innocent until proved guilty to law”**.

Conflicting problems arise as Article 17 of the International Covenant of Civil and Political Rights states:-

**1, No one shall be subject to arbitrary or unlawful interference with his privacy....**

**2, Everyone has the right to the protection of law to such privacy.....**

The operative words are unlawful interference with his privacy. It is the AIPD'S contention that any matters before the Courts and Tribunals are lawful and therefore privacy should not prohibit a Defendant from being equal before the Courts and Tribunals as currently exists today because of the anti competitive legislation that presently exists.

The public must be protected from unethical Private Investigators and this is not done at the moment as the Police Service cannot investigate civil matters and nor should they and the public have no proper or defined recourse.

The AIPD'S Draft Private Investigators Bill provides such an environment and also would insure professional training and qualifications for the industry.

The AIPD Draft Private Investigators Bill would place Private Investigators on a competitive basis with officers in the NSW Police Service. This competition would go a long way to eliminate abuse and corruption within the NSW Police Service.

Due to the fact that Private Investigators prepare briefs for the defence and prosecution in the civil and commercial jurisdictions as well as the defence in criminal matters, all matters handled are subject to the legal jurisdictions and in most cases instructions to Private Investigators are received from Solicitors.

Extensive knowledge of the various laws in the various jurisdictions is paramount for a competent Private Investigator.

Only a very small proportion of Private Investigators operate in the consumer area and it is therefore our submission that ministerial responsibility for the private investigation industry must reside with the Attorney General.

The AIPD believes that any alterations or changes that are contemplated to the existing Act or a completely new Act should have the input of the industry as a whole and it must be independent of any influence of the Police Service to make sure that there can be no anti-competitive influence on the Private Investigation Industry.

The AIPD believes that it should have an input as it is the major organization representing Private Investigators in NSW having acquired in excess of 490 members since incorporation in January 1992.

The AIPD are available at any time to discuss in a meaningful way any information supplied above or for further clarification of any matters that are unclear.

The AIPD would like to point out some information gleaned from the poll that was conducted in March 1999 in six marginal seats, Bligh, Maitland, Manly, Miranda, Parramatta and Ryde.

	<b>Yes</b>	<b>No</b>
<b>Do you believe all people in NSW should be treated equally before the law?</b>	<b>97%</b>	<b>8%</b>
<b>Did you know that, at present, if you are a Defendant in court, that your lawyers cannot get access to all information held by Government Departments that could be used to assist your defence</b>	<b>14%</b>	<b>85%</b>
<b>Do you think that you should be able to access that information for your defence?</b>	<b>94%</b>	<b>6%</b>
<b>Do you believe that Private Investigators should be qualified?</b>	<b>95%</b>	<b>4%</b>
<b>Do you believe that the NSW Government Should regulate Private Investigators?</b>	<b>91%</b>	<b>7%</b>
<b>(If Yes) Which Government regulatory authority, do you believe, would be best suited to do this job:</b>		
<b>The Police OR</b>	<b>20%</b>	
<b>The Professional Standards Commission OR</b>	<b>34%</b>	
<b>The Attorney General's Department</b>	<b>43%</b>	
<b>Would you support properly trained, Independent Investigators investigating complaints against Police officers</b>	<b>90%</b>	<b>8%</b>
<b>Would you support properly trained, independent investigators investigating criminal matters on behalf of the Police?</b>	<b>69%</b>	<b>29%</b>

It can be seen from the poll that **77%** of the public do not want the Police to have any involvement in the Private Investigation Industry.

**91%** of the people believe that the NSW Government should regulate Private Investigators,

**95%** believed that Private Investigators should be qualified.

**94%** believed that Private investigators should have access to information for your defence.

**97%** believed that all people should be treated equally before the law.

Yours faithfully,

John Bracey.

17/2/02

Enclosures.