



Summary

Operation Dawson

An investigation into alleged misconduct by a former Victoria Police Superintendent.

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Operation Dawson was an investigation by the Independent Broad-based Anti-corruption Commission (IBAC) into the alleged police misconduct of then Superintendent Paul Rosenblum.

Summary of investigation

In November 2017, Victoria Police informed IBAC of allegations that Superintendent Rosenblum¹ had misused his position to influence police investigations into sexual offences involving members of his church. Allegations included that he unlawfully accessed and disclosed police information to members of the public involved in those investigations, or their associates. As a result, IBAC conducted an 'own motion' investigation under section 64(1)(c) of the *Independent Broad-based Anti-corruption Commission Act 2011* (Vic) (IBAC Act).²

IBAC found Superintendent Rosenblum engaged in police misconduct by using his position to obtain and disclose police information without authorisation, about investigations in which he had a personal, rather than a professional, interest.

As a result of IBAC's investigation, Superintendent Rosenblum was charged with misconduct in public office (MIPO). He pleaded guilty to unauthorised access of police information in lieu of the original MIPO charge and was sentenced to a three-month adjourned undertaking with no conviction recorded. As part of the adjourned undertaking, Superintendent Rosenblum was ordered to make a \$10,000 contribution to Beyond Blue and a \$10,000 contribution to the Blue Ribbon Foundation.

This is a summary of IBAC's Operation Dawson Special Report. The full report is available on [IBAC's website](#).

Key points

- Superintendent Rosenblum was a senior officer in the Information Systems and Security Command at Victoria Police. His seniority and responsibility for managing Victoria Police's information security and privacy risks increased the seriousness of his conduct. His behaviour negatively affected people involved in the police investigations and risked undermining confidence in the integrity of Victoria Police.
- Operation Dawson serves as an important reminder to officers to maintain the confidentiality of police information, even when enquiries are made by senior colleagues and particularly when colleagues cannot demonstrate a legitimate business need for the information.
- Operation Dawson identified there were some senior leaders and officers who questioned, stood up to and reported Superintendent Rosenblum's improper conduct. IBAC commends these officers for contributing to a stronger and more ethical culture within Victoria Police.
- Although Victoria Police has advised it had taken significant steps to strengthen its information security in response to separate IBAC investigations, IBAC considers unauthorised access to and disclosure of information to be enduring corruption and police misconduct risks. Some police personnel continue to disregard their obligations around information use, and Victoria Police needs to continue to improve employees' understanding of the seriousness of this conduct.

¹ While he resigned from Victoria Police while under investigation in April 2019, this summary will refer to Superintendent Paul Rosenblum using his rank at the time of the alleged conduct and his resignation.

² IBAC may investigate police personnel conduct in response to a complaint or a notification from Victoria Police, or on its 'own motion'. IBAC can initiate 'own motion' investigations into police personnel conduct under section 64 of the IBAC Act where IBAC determines a matter should be investigated even though a complaint or notification has not been received.

Systemic corruption and police misconduct risks

IBAC's investigation identified a number of systemic corruption and police misconduct risks:



Conflicts of interest in investigations of criminal offences

IBAC found that Superintendent Rosenblum failed to appropriately manage clear conflicts of interest. IBAC has repeatedly raised concerns with Victoria Police on this issue including through IBAC investigations, reviews of Victoria Police investigations and audits of how Victoria Police handles complaints.



Unauthorised information access and disclosure

IBAC found that police information was accessed and disclosed without authorisation, using Victoria Police systems and personnel. This is a significant concern for IBAC, as it is frequently detected in corruption and police misconduct investigations.



Poor complaints management by the Professional Standards Command (PSC)

Allegations against Superintendent Rosenblum were submitted to PSC in September 2017 and were initially classified by PSC as an 'incident file' rather than a complaint.³ Incident files are not notified to IBAC and therefore IBAC was unlikely to have identified these allegations prior to this matter being reclassified as a complaint (which occurred in November 2017). This matter should have been classified as a complaint when it was received by PSC, particularly considering Superintendent Rosenblum's rank and the seriousness of the allegations.

IBAC has previously raised concerns with Victoria Police about the inappropriate classification of matters including classifications that may limit IBAC's ability to provide effective, timely oversight.⁴

Outcomes

As a result of Operation Dawson, IBAC recommended that Victoria Police regularly reinforces the legislation, policies, and requirements around the access to and use of Victoria Police information through training and education activities with all personnel. In particular, as it relates to:

- matters personnel have a personal involvement or interest in
- police personnel's obligation not to disclose information to other personnel if not required by their current duties
- the serious consequences of improper conduct, as highlighted by Operation Dawson.

IBAC also recommended that the Victorian Government amend section 226 of the *Victoria Police Act 2013 (Vic)* to provide a clear obligation for police personnel to only access, make use of, or disclose police information if required by their current duties.

IBAC's recommendations are designed to reinforce and help promote a positive information security culture within Victoria Police with clear personal accountabilities.⁵

Since Operation Dawson, Victoria Police is reviewing its conflict of interest policy and developing a practice guide to help officers better identify and manage conflicts of interest. There is an opportunity for Victoria Police to use this investigation as a case study to inform officers of the risks of not identifying and managing conflicts of interest appropriately.

IBAC is continuing to work with Victoria Police to help ensure police employees act with integrity and in accordance with the organisation's values, policies, processes and code of conduct.

³ The Victoria Police Manual does not provide clear definitions for 'complaints' or 'incidents'. Generally, information is classified as in 'incident' when no further action is required by PSC.

⁴ IBAC 2018, *Audit of complaints investigated by Professional Standards Command, Victoria Police*, IBAC, Melbourne.

⁵ A *positive security culture* with clear personal accountability and a mature understanding of managing risk, responsibility and reputation allows an organisation to function effectively and support the delivery of government services. This is one of the six guiding principles of the Victorian Protective Data Security Framework and its standards (the VPDSF and VPDSS). See Office of the Victorian Information Commissioner, *Victorian Protective Data Security Framework and Standards*, 'Guiding Principles' <ovic.vic.gov.au/data-protection/guiding-principles/>.

Useful IBAC resources

Operation Dawson – Special Report

www.ibac.vic.gov.au/publications-and-resources/article/operation-dawson-special-report-december-2021

What is police misconduct?

www.ibac.vic.gov.au/reporting-corruption/what-can-you-complain-about/what-is-police-misconduct

IBAC's police oversight role

www.ibac.vic.gov.au/publications-and-resources/article/special-report-concerning-police-oversight

Unauthorised access and disclosure of information held by Victoria Police

www.ibac.vic.gov.au/publications-and-resources/article/unauthorised-access-and-disclosure-of-information-held-by-victoria-police

Managing corruption risks associated with conflicts of interest in the Victorian public sector

www.ibac.vic.gov.au/publications-and-resources/article/managing-corruption-risks-associated-with-conflicts-of-interest-in-the-victorian-public-sector

Audit of complaints investigated by Professional Standards Command, Victoria Police

www.ibac.vic.gov.au/publications-and-resources/article/audit-of-complaints-investigated-by-professional-standards-command-victoria-police

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IBAC is Victoria's anti-corruption agency responsible for preventing and exposing public sector corruption and police misconduct. We do this by:

- investigating serious corruption and police misconduct
- informing the public sector, police and the community about the risks and impacts of corruption and police misconduct, and ways in which it can be prevented.

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