

# 2024 Child Rights Progress Report on Child Justice

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South Australia's progress on recommendations made  
by the UN Committee on the Rights of the Child



## About the Commissioner for Children and Young People

The [South Australian Commissioner for Children and Young People](#) is an independent position, established under the [Children and Young People \(Oversight and Advocacy Bodies\) Act 2016](#) (OAB Act). This legislation was introduced to the South Australian Parliament in response to the [Child Protection Systems Royal Commission 2014](#).

The Commissioner promotes and advocates for the rights, development and wellbeing of all children and young people in South Australia and seeks to change laws, policies, systems and practice to uphold children's rights.

The work of the Commissioner for Children and Young People is guided by the [United Nations Convention on the Rights of the Child](#) (UNCRC); the core international treaty established in 1989 to which Australia is a signatory. This important agreement sets out the civil, political, economic, social, and cultural rights of children around the world.

The Commissioner aims to ensure that as a part of the Australian Commonwealth, South Australia enacts its international obligations under this Convention.

Each year the Commissioner produces a series of Child Rights Progress reports measuring South Australia's progress against recommendations made by the UN Committee on the Rights of the Child (the Committee).

This year's progress reports comprise:

- Child Health
- Child Justice
- Child Protection
- Disability
- Education
- Environment
- Physical Punishment

Data reported in the data tables are the most accurate available at the time of writing.



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## What the data says

| Measure  | Year: Data   | 1 year change      | 5 year trend                         | 5 year assessment |
|--|--|--------------------|--------------------------------------|-------------------|
| Average daily number of children in SA Child Justice System: Detention.  | 2022/23: 25<br>2021/22: 30<br>2020/21: 25<br>2019/20: 35<br>2018/19: 38  | Slightly decreased | Fluctuating, decrease from base year | + Favourable      |
| Average daily number of children in SA Child Justice System: Community-based supervision. <sup>1</sup>                         | 2022/23: 188<br>2021/22: 151<br>2020/21: 138<br>2019/20: 169<br>2018/19: 156   | Increased          | Fluctuating, increase from base year | - Unfavourable    |
| Number of individual children and young people admitted to Adelaide Youth Training Centre (AYTC). <sup>2</sup>                 | 2023/24: 312<br>2022/23: 324<br>2021/22: 292<br>2020/21: 256<br>2019/20: 328   | Slightly decreased | Fluctuating, decrease from base year | + Favourable      |
| Number of Aboriginal children and young people admitted to AYTC (% of all detainees). <sup>3</sup>                             | 2023/2024: 177 (56.7%)<br>2022/23: 179 (53.3%)<br>2021/22: 138 (47.3%)<br>2020/21: 111 (43.3%)<br>2019/20: 159 (48.4%)                 | Stable             | Fluctuating, increase from base year | - Unfavourable    |
| Number of children under a guardianship order at time of their admission to AYTC (% of all detainees). <sup>4</sup>            | 2022/23: 88 (27.2%)<br>2021/22: 83 (28.4%)<br>2020/21: 78 (30.4%)<br>2019/20: 93 (28.3%)<br>2018/19: 93 (31.1%)<br>2017/18: 77 (23.4%) | Slightly decreased | Fluctuating, increase from base year | - Unfavourable    |
| Number of children aged 10-13 years (inclusive) at the time of their admission to AYTC (% of all detainees). <sup>5</sup>      | 2022/23: 39 (12.0%)<br>2021/22: 52 (17.8%)<br>2020/21: 43 (16.7%)<br><br>Not reported in previous years.                               | Decreased          | Fluctuating, decrease from base year | + Favourable      |
| Number of children with a known diagnosed disability in AYTC (% of all detainees).*  | 2023/24: Not available<br>2022/23: 85 (25.3%)  | Not available*     |                                      |                   |
| Average daily no. of children with a known diagnosed disability in AYTC (% of daily population of all detainees). <sup>6</sup> | 2023/24: Not available<br>2022/23: No number provided (59.5%)  |                    |                                      |                   |

\* The Department of Human Services does not provide data on disability in relation to AYTC. The Training Centre Visitor started collecting data on disability, which is used here, although is likely to be an underestimate.<sup>7</sup>

\*\*The Office of the Guardian for Children and Young People's annual reporting changed for 2023-24. It did not include updated figures in relation to numbers of children and young people in detention which had been reported upon in previous Training Centre Visitor reports and subsequently referenced in earlier Child Rights Progress Reports. Instead, the Guardian is publishing separate smaller reports throughout 2024-25.

## Areas of concern include:

- Failure to implement and comply with basic requirements of the Optional Protocol to the Convention Against Torture and other Cruel, Inhuman and Degrading Treatment or Punishment (OPCAT).
- The overrepresentation of vulnerable children in the criminal justice system, including children with a disability, children in care and Aboriginal children.
- The significant proportion of children on remand being detained in Adelaide Youth Training Centre (AYTC).
- Lack of commitment by the state government to develop a roadmap to raise the minimum age of criminal responsibility and lack of long term, consistent resourcing into diversionary practices.

## Background

The UN Convention on the Rights of the Child (UNCRC) was the first international Convention to acknowledge that children have rights and that these rights should be protected. Australia ratified the UNCRC in 1990 and South Australia's *Children and Young People (Oversight and Advocacy Bodies) Act 2016* (OAB Act) states that all government authorities must seek to give effect to the UNCRC. The Convention sets minimum standards and obligations for the protection of children's and young people's rights, including their rights to have access to justice, education, health care and social services. All children have the right to have a say on all matters that affect them and for their views to be taken seriously. In making decisions about children their best interests should be the primary concern, as well as the right to be safe and to be free from discrimination.

Every five years, the Australian Government reports to the UNCRC Committee to explain how Australia is fulfilling its obligations in relation to child rights. In response to Australia's fifth and sixth periodic reports, the Committee highlighted key areas of concern and made recommendations to ensure governments at both the Commonwealth and State levels fulfil their obligations under the Convention. One of the Committee's main areas of concern requiring urgent attention is child justice.

## Children's rights in relation to Child Justice

According to the UNCRC, children who come into contact with the criminal justice system have the same rights as all other children. This includes the right to be kept safe, to be heard, and to be treated in a way that promotes their dignity and worth.

The UNCRC also provides extra protections for children who enter the youth justice system. These include:

- placing an emphasis on prevention, rehabilitation and reintegration of young offenders over punishment
- using detention as a measure of last resort and for the shortest possible period; and
- setting the minimum age of criminal responsibility to the recommended 14 years.<sup>8</sup>

## The Child Justice System in South Australia

Children who are in contact with the justice system are treated differently to adults in the legal system, with diversion being a key goal. The Department of Human Services (DHS) oversees and manages children who are placed in detention, or who are undertaking community service. It also manages diversionary services to keep children out of the justice system.

There is a separate criminal court for children (the Youth Court) and a separate facility for children who are detained (the Adelaide Youth Training Centre (AYTC)). Children who are on remand are often detained in the same facility with children who have been sentenced.

The *Young Offenders Act 1993* (SA) and the *Youth Justice Administration Act 2016* (SA) are the key pieces of legislation in relation to child justice. The Young Offenders Act outlines the three tiers of South Australia's child justice system, including two tiers of pre-court diversion: formal and informal police caution, and family conference. These apply where a young person is a first offender, or relatively low-level offender and admits to the alleged offending.

The criminal jurisdiction of the Youth Court deals with charges against young people between the ages of 10 and 18 years at the time of the alleged offence. The Youth Court hears and determines matters when charges have been laid, including matters that are disputed or related to more serious offences. The Youth Court has discretion to refer matters back to be dealt with by family conference or formal police caution.

The *Youth Justice Administration Act 2016 (SA)* allows for the establishment of ‘training centres’ as ‘necessary or desirable for the care, rehabilitation, detention, training or treatment of youths’.

Since the Youth Justice State Plan 2020–2023 concluded in June 2022 there has been no public reporting on the implementation or evaluation of the Plan, and no new plan has been developed.

The Training Centre Visitor (TCV) was legislated under the *Youth Justice Administration Act 2016*. The TCV’s main function is to promote the safety and wellbeing of children detained in AYTC by upholding and advocating for the rights of the children; inspecting the centre; promoting the child’s best interests; advocating for children in the centre to resolve issues; and investigating systemic reform or any other matter referred to by the Minister.

Some welcome developments in 2024 include:

- Finalisation of the development of an enhanced support service model of care to improve responses for children and young people in AYTC with complex and disability-related needs. It is planned that this model will commence when the 12-bed counselling and sensory accommodation unit is opened.<sup>9</sup>
- Availability of the Child Diversion Program on a statewide basis, 24 hours a day, 7 days a week, to divert Aboriginal children aged 10 to 13 years away from the custodial system.
- Continuation of the trial Youth Aboriginal Community Court Adelaide (YACCA), which also aims to divert young Aboriginal children and young people away from the custodial system.
- Implementation of new training models for the AYTC recruits on support of young people in custody who are transgender/ diverse or from culturally and linguistically diverse backgrounds, alongside the Sensory and Environmental Framework which aims to reduce the physical and psychological impacts of the custodial environment.<sup>10</sup>

## South Australia’s progress on the latest recommendations made by the UN Committee in relation to child justice:



**No evidence** that the UN Committee’s recommendation is being addressed



**Some evidence** that the UN Committee’s recommendation is being addressed



**Clear evidence** that the UN Committee’s recommendation is being addressed

## Current Status

**Explicitly prohibit the use of isolation and force, including physical restraints, as a means of coercion/discipline of children under supervision.**

### Behaviour management in AYTC

The behaviour management scheme in AYTC is based on a model where incentives are available as a child progresses (or regresses) through ‘phase’ levels. The rewards are based on staff assessments of a child’s personal interactions, hygiene, respect shown to staff, and compliance with rules. Low scores result in fewer privileges and more restrictions. This scheme is not necessarily trauma informed and continual professional education in trauma informed practice and disability is needed to ensure that children are not punished for behaviour that arises from a child’s trauma, mental health, or disability.

In September 2023, Youth Justice partnered with the University of Adelaide ‘to review and strengthen its current Case Management Model, with a particular focus on the capacity to integrate a more culturally safe and trauma informed approach to assessment and case planning.’<sup>11</sup> It is expected that the review of the case management model will be finalised in the 2024–25.<sup>12</sup>

## Isolation and solitary confinement

The United Nations Rules for the Protection of Juveniles Deprived of their Liberty (United Nation Rules) explicitly prohibits use of isolation and solitary confinement of children as a disciplinary measure.<sup>13</sup> Isolation and solitary confinement is a concern raised by children in AYTC.<sup>14</sup>

The Commissioner remains concerned about reports that children are spending up to 20 hours in their cells mainly due to ‘rolling unlocks’ amid staffing issues in response to incidents, or because they are on a ‘restricted routine’.<sup>15</sup>

Solitary confinement is inconsistent with international law, as well as principles and objects in South Australian legislation. It is the Commissioner’s position that detention should only be used as a last resort and that active efforts should be made to keep children who have been arrested, but not sentenced, out of detention and safe in their community where they will be connected to family and education. If staff shortages result in children being routinely locked in their rooms, children on remand should be released, including those under the care and protection of the Chief Executive of the Department for Child Protection.

## Inconsistent reporting of incidents

An audit undertaken by the Training Centre Visitor in 2023 found a number of serious incidents – including the use of physical restraints – that were not appropriately recorded as ‘reportable incidents’ in accordance with the Centre’s Operational Order 33, putting children at risk. The TCV is currently formally inquiring into this matter.<sup>16</sup>

**Promptly investigate all cases of abuse and maltreatment of children in detention, and adequately sanction the perpetrators.**

In respect to preventing and reporting abuse and torture, Australia missed its deadline to fully implement the *Optional Protocol to the Convention Against Torture and other Cruel, Inhuman and Degrading Treatment or Punishment* (OPCAT).<sup>17</sup> The Training Centre Visitor is the National Preventative Mechanism (NPM) for children in AYTC, but this has not been extended to other places of detention (contrary to OPCAT requirements). Australia has been criticised for not complying with basic OPCAT commitments and the UN Subcommittee on Prevention of Torture and other Cruel, Inhuman or Degrading Treatment or Punishment (SPT) cancelled its visit to Australia in February 2023.<sup>18</sup>

It is critical that governments must resource National Preventive Mechanisms (NPMs) so that they are able to fully and effectively carry out their functions and powers under OPCAT and prevent harm to children and young people.<sup>19</sup> At the 23 February 2024 Standing Council on Attorneys General (SCAG) meeting, all participants affirmed their commitment to continue to cooperatively and progressively work together towards full implementation of OPCAT obligations.<sup>20</sup> Similar commitments have been noted in previous Child Rights Progress Reports. However, the South Australian Government’s position continues to be that funding to implement OPCAT is a matter for the Australian Government.<sup>21</sup>

- **No evidence** that the UN Committee’s recommendation is being addressed
- **Some evidence** that the UN Committee’s recommendation is being addressed
- **Clear evidence** that the UN Committee’s recommendation is being addressed

As outlined in the previous sections, major concerns continue to include children being restrained and locked in their rooms and the overuse of restraint as a de-escalation technique.

In the 2023–24 year the TCV received 308 enquiries across 237 points of contact for children and young people: 278 were in mandate, with 29 referred to another team within the GCYP and 1 to an external provider. The top 5 enquiries for children and young people related to their physical health, the staff in the centre, the facilities, concerns in respect to fellow children and the need for cultural support.<sup>22</sup>

The Training Centre Visitor also prioritises particularly vulnerable children that enter the centre, including children and young people aged between 10 and 13 years, those with significant and complex disability or mental health needs, and young people accused of significant offending (particularly when the circumstances are reported to the media).

**Require decision-makers operating within child justice to consider what is in the best interests of the child.**

South Australia's *Youth Justice Administration Act 2016* requires those administering the Act to give consideration 'at all times to promoting the wellbeing and best interests' of children. The *Young Offenders Act 1993* (SA), however, does not refer to the best interests of the child.

Despite the legislative mandate in the *Youth Justice Administration Act*, best interests does not appear to be a central consideration in decision making. This means vulnerable children in the community are overrepresented in the child justice system.

Placing children who often require a public health and trauma informed response in detention is not in their best interests. For example, the average daily detention population highlights the continued overrepresentation of children in the justice system who are under guardianship, Aboriginal children, and children with a known, diagnosed disability.

The following issues and practices appear to be contrary to children's best interests and are of concern:

- children facing extended periods of remand reportedly due to a lack of alternative accommodation options
- extended periods of isolation and time in cells due to staff shortages or modified routines; and
- over-representation of Aboriginal children in the child justice system.

The Training Centre Visitor has a statutory function to promote the best interests of young people in detention. Considering a child's best interests requires respect for young people's right to be heard. Consistent with the Charter of Rights for Youths Detained in Youth Justice Facilities, this includes ensuring mechanisms through which young people can advocate for themselves and others, make a complaint about their treatment, and be told what happens with their complaint.

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In 2024, the Guardian and Training Centre Visitor developed an oversight framework for children in the state's out-of-home care and youth detention systems. It was developed to include opportunities for input from children and young people themselves and should bring greater accountability, transparency and consistency in the care and support being provided to children and young people within these mandates.<sup>23</sup>

**Raise the minimum age of criminal responsibility to an internationally accepted level and make it conform with the recommended minimum age of 14 years.**

Research shows that the earlier children enter the criminal justice system the higher the risk that they will become entrenched within it and have continued interaction with correctional services.<sup>24</sup> South Australian research using the SA Better Evidence Outcomes Linked Data found that children who have early contact with the justice system, compared to children with late contact, experience more serious and extended periods in the criminal justice system. They were also more disadvantaged, had more serious child protection contact by the age of 10, with experience of mental health related hospitalisations from the ages of 12–18 years.<sup>25</sup>

It is now well accepted that a public health approach is required to keep children safe, connected to school and to extended families and community, and to help prevent children from moving into the criminal justice system. This includes more intensive and active efforts and supports for children to increase their access to diversionary and restorative programs, re-engage them with community and promote prosocial behaviours.

In 2022–23, there were 39 children under the age of 14 years admitted to the Training Centre, or 2.5% of the total population in AYTC. Two of these children were only 10 years of age and in primary school, though both were there for no longer than a day.<sup>26</sup>

The rate of children aged 10 to 13 years undertaking community service is lower than the rate of children aged 10 to 13 years who are in detention. In 2022–23, there were 4.0 children per 10,000 aged 10–13 years undertaking community service compared to 4.4 per 10,000 in detention.<sup>27</sup> The rate is much higher for Aboriginal children and young people aged 10–13 years, with 65.7 per 10,000 undertaking community service and 56 per 10,000 in detention.<sup>28</sup> More should be done to address the systemic racial bias and to ensure this age group is kept out of detention by either being given community service or being diverted from the criminal justice system altogether.

There continues to be little movement on raising the minimum age of criminal responsibility in South Australia despite the Attorney-General releasing a discussion paper, 'Alternative diversion model for children under the raised age of criminal responsibility' for feedback in February.

Some concerns included:

- the lack of a rights-based approach that is guided by current international best practice
- the numerous exceptions to raising the age of criminal responsibility

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- the extension of police powers that could result in more police-child interaction, not less'; and
- the lack of definition around the 'places of safety' and what these places look like to children and young people.<sup>29</sup>

To date the Attorney-General has stated that he has no policy in relation to raising the minimum age of criminal responsibility, but prioritises safety, and will replace a justice response using a therapeutic model.<sup>30</sup>

Nationally, there does not appear to be a unified approach on raising the minimum age of criminal responsibility across Australian states and territories, with only some states raising it. Concerningly, new governments in Northern Territory and Queensland have promised to reduce it again, despite the evidence that this will not make communities safer and not in the best interests of children.<sup>31</sup>

**Actively promote non-judicial measures, such as diversion, mediation and counselling for children accused of criminal offences, and where possible the use of non-custodial sentences, such as probation or community service.**

The Commissioner remains concerned about the piecemeal approach to resourcing, expanding, and evaluating alternative approaches to diversionary services in South Australia for children and young people. She recommends being guided by the latest report from the Age of Criminal Responsibility Working Group.<sup>32</sup>

At a national level the Australian Government committed \$69 million over 4 years to establish a National Justice Reinvestment Program to support up to 30 community-led initiatives, with ongoing funding of \$20 million per year from 2026–27. It also committed \$12.5 million over four years to design and establish an independent National Justice Reinvestment Unit to coordinate these initiatives at a national level. To date, Healthy Dreaming Pty Ltd in Port Augusta has been granted funding in South Australia.<sup>33</sup>

Other welcome developments during the year include:

- The Service to Aboriginal Youth (STAY) program, which focuses on early intervention, providing at-risk Aboriginal young people between the ages of 10 and 19 years with access to services, guidance to achieve their goals and strengthen their cultural and community connections and build long-term resilience. This program is being run through 9 providers (4 being Aboriginal Community Controlled Organisations) and is being delivered in the following locations: Yalata, Koonibba, Ceduna, Port Lincoln, Whyalla, Port Augusta, Port Pirie, Coober Pedy, the Riverland and Murray Bridge.<sup>34</sup>
- The Child Diversion Program has been expanded across the state offering support 24 hours a day, 7 days a week to divert Aboriginal children aged 10 to 13 years away from the custodial system.
- The Aboriginal Youth Pathways to Employment Pilot, run by the South Australian Aboriginal Building and Civil Construction Academy in partnership with The Umbrella Collective, offers 'culturally appropriate training, mentoring, and employment within the building, civil, and construction industries.' There will be four intakes of 6 to 8 participants within 24 months. However, participants need to be 17 years of age and above to access the pilot program.<sup>35</sup>

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- The DHS is leading the Port Augusta Intensive Youth Response – alongside multiple key agencies – to provide wrap-around support for young people engaging with the child justice system.<sup>36</sup>

Child diversions by police in South Australia are low when compared over the past 10 years, with 30.4% of alleged child 'offenders' being diverted in 2022–23 compared to 40.9% in 2013–14. The rates are lower for Aboriginal children and young people who are alleged to have offended, with only 22.5% of alleged Aboriginal offenders being diverted away from court in 2022–23 (compared to 35.7% for non-Aboriginal children).<sup>37</sup>

The family conferencing team works with the young person, their parents, guardians, family and friends, the victim of the offence and their supporters, and a police youth officer to divert the young person away from the justice system. It usually requires the young person to pay compensation, carry out community service, apologise to the victim, and/or anything else deemed appropriate. South Australia has the lowest proportion of family group conferences in the nation resulting in a diversion agreement. In 2022–23, only 44.6% of conferences resulted in an agreement compared to the national average of 83.9%.<sup>38</sup> Although the number has increased, the real recurrent expenditure for these services has remained steady from \$1.9 million (\$11.10 per child) in 2014–15 to \$1.8 million (\$12.35 per child) in 2021–22 meaning more has to be done with less resources.<sup>39</sup>

Other areas of concern are:

- The high rates of children in detention during 2022–23 (57.6%) who have had an interaction with the child protection system in the past ten years.<sup>40</sup> This reveals a lack of progress by government to address the criminalisation of children in out-of-home care for behaviour that would not result in police intervention had it occurred within a home environment.
- children are still being locked up in Police cells alongside adults, due to the denial of bail; and
- there is an overrepresentation of other groups of children in the child protection system, including Aboriginal children and children living with a disability.

**Provide children in conflict with the law, with information about their rights and how to report abuses.**

Children have the same rights as adults within the justice system, however, the Commissioner remains concerned that these rights are not being fully realised. Further, many children do not understand their rights, and often do not have the capacity to ensure their rights are being upheld. This includes the right to a lawyer and not being required to answer questions. When children are arrested, before questioning them police should do their utmost to ensure a parent or guardian is present.<sup>41</sup>

During the year, the Youth Court launched the Indigenous Bail Video, part of a series of videos produced through the Information Platform Project to develop an age and client-centric platform of resources to assist children and young people who are required to go to court.



During the year, there have been concerns raised by stakeholders about the lack of privacy in the AYTC, including officers being present when children are talking to their lawyers. Children in AYTC have rights relevant to their particular circumstances. These are set out in the Charter of Rights for Youths Detained in Training Centres (Charter of Rights). Core rights in the Charter of Rights include being treated with dignity, being able to make a complaint, having access to key services such as health and education, spending time outside, and having regular contact with family and community members.<sup>42</sup>

Children in detention can provide feedback to AYTC through an internal feedback/complaint system, or through a Resident Incident Comment Sheets (RICS). Staff at the Centre are required to provide children with these forms, after a formal record of an incident has been made. Children in detention can also seek support from the Training Centre Visitor. Staff can also approach the TCV when they are concerned about a child and cannot resolve it through AYTC channels. Children can also ring or email the TCV.

During the year the TCV opened 222 advocacy files, 19 were 'out of mandate' where the TCV referred the child to the correct supports, with 37 resolved on the same day. Advocacy efforts covered issues around a child's health and wellbeing including health and safety risk, an unmet health need or delayed medical care; how staff respond, including unfair behaviour management, isolation and care concerns; rehabilitation, including access to quality education and cultural supports – for example, African Australian children and young people; maintenance and cleaning issues; and advocacy for a child under 14 years to be able to dispose of menstrual hygiene products.<sup>43</sup>

#### Endnotes

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- 3 Guardian for Children and Young People, Training Centre Visitor, *2023–2024 Annual Report*, p 35. Training Centre Visitor, *2022–2023 Annual Report*, p 43. Training Centre Visitor, *2021–2022 Annual Report*, p 9. Training Centre Visitor, *2020–2021 Annual Report*, p 12. Training Centre Visitor, *2019–2020 Annual Report*, p 8.
- 4 Training Centre Visitor, *2022–2023 annual report*, p 36.
- 5 Training Centre Visitor, *2022–2023 annual report*, p 103.
- 6 Training Centre Visitor, *2022–2023 annual report*, p 49.
- 7 Training Centre Visitor, *2022–2023 annual report*, p 49.

- 8 UN Human Rights Committee (HRC), *CCPR General Comment No. 24: Article 24 (Rights of the Child)*, 2019, accessed 6 December 2023, <https://www.ohchr.org/en/documents/general-comments-and-recommendations/general-comment-no-24-2019-childrens-rights-child>.
- 9 Department of Human Services, *2023–24 Annual Report for the Department of Human Services*, accessed at 29 November 2024, [https://dhs.sa.gov.au/\\_\\_\\_data/assets/pdf\\_file/0019/172630/Department-of-Human-Services-Annual-Report-2023-24.pdf](https://dhs.sa.gov.au/___data/assets/pdf_file/0019/172630/Department-of-Human-Services-Annual-Report-2023-24.pdf).
- 10 DHS *2023–24 Annual Report*, p59.
- 11 Department of Human Services, *An evidence based approach to support young people in the youth justice system*, 11 September 2023, accessed on 18 November 2024, <https://dhs.sa.gov.au/news/2023/evidence-based-approach-to-support-young-people-in-the-youth-justice-system>.
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- 15 Guardian for Children and Young People, Training Centre Visitor, *2023–2024 Annual Report*, p 36.
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