URBIS

ADELAIDE PARK LANDS DRY AREA REGULATIONS EVALUATION

Prepared for

CITY OF ADELAIDE

3 March 2025

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Project Code	P0056199
Report Number	v3

Acknowledgement of Country

Urbis acknowledges the Traditional Custodians of the lands we operate on.

We recognise that First Nations sovereignty was never ceded and respect First Nations peoples continuing connection to these lands, waterways and ecosystems for over 60,000 years.

We pay our respects to First Nations Elders, past and present.

The river is the symbol of the Dreaming and the journey of life. The circles and lines represent people meeting and connections across time and space. When we are working in different places, we can still be connected and work towards the same goal.

Title: Sacred River Dreaming
Artist Hayley Pigram
Darug Nation
Sydney, NSW

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ACRONYMS AND ABBREVIATIONS

Acronym	Meaning
ACCO	Aboriginal Community Controlled Organisation
APY Lands	Anangu Pitjantjatjara Yankunytjatjara
CoA	The City of Adelaide
CIR	Cox Inall Ridgeway
DASSA	Drug and Alcohol Services South Australia
DHS	Department of Human Services
MAP	Mobile Assistance Patrol
The regulations	Adelaide Park Lands Dry Area Regulations
SA	South Australia
SAAS	South Australian Ambulance Service
SACAD	South Australian Computer Aided Dispatch
SAPP	Supervised Alcohol Provision Program

EXECUTIVE SUMMARY

INTRODUCTION

The regulations

The Adelaide Park Lands (the Park Lands) are a network of 29 parks and six city squares that enclose and separate the City of Adelaide (CoA) from its suburbs. The Park Lands include a diverse range of open spaces, landscapes, community buildings, play spaces, facilities and businesses for people living in and visiting Adelaide to enjoy.

In 2014, the Adelaide Park Lands Dry Area Regulations ('the regulations') were established as a trial to address the impacts of alcohol-related behaviour in the Park Lands for the local community. The regulations make it illegal to consume alcohol or carry an open liquor container in designated Dry Areas without a permit,[1] and are in place to help CoA to manage the use of the Park Lands and provide safe and accessible spaces for all community members.

Since 2014, the regulations have been subject to three reviews and extended on multiple occasions. The designated Dry Areas are:

- Adelaide Park Lands Area 1, which has been in place since 2014, is in effect from 8.00pm to 11.00am the following day, seven days per week, covering most of the Adelaide Park Lands.
- Adelaide Park Lands Area 2, which was introduced in 2021 (City Community Services and Culture Committee, 2023) and covers Blue Gum Park/Kurangga (Park 20) and Veale Park/Walya Yarta (Park 21), is in effect for 24 hours a day, seven days a week.

Alcohol consumption in the Park Lands

Alcohol consumption in the Park Lands by different groups is driven by a range of social, cultural and economic factors. For young people and people experiencing homelessness or sleeping rough, the relative accessibility and openness of the Park Lands make it a convenient location for individuals who may not have access to private spaces in which to consume alcohol. For many Aboriginal people, including those visiting from rural and remote communities, the Parks Lands provide a gathering place for socialising, cultural connection, camping and community bonding. The consumption of alcohol in the Park Lands by Aboriginal rural and remote visitors must be understood through a historical lens. It is well established within the literature that policies and practices stemming from colonisation have ongoing impacts on patterns of alcohol consumption amongst Aboriginal people and on related police interactions.

THE EVALUATION

Aims

Urbis was engaged by CoA to conduct an evaluation of the regulations. The purpose of the evaluation was to understand the effectiveness and impact of the regulations, and to provide recommendations about their continuation and potential alternative measures that support outcomes for all community members and stakeholders. The evaluation aimed to assess:

[1] Those wishing to consume alcohol during the times that an area is designated as a dry area, including as part of an event, must apply for a liquor licence through the State Government Consumer and Business Services.

- Implementation of the regulations, including the strategies used in the implementation, the effectiveness of these strategies, the appropriateness of the Dry Area time span and the barriers and enablers to successful implementation.
- Effectiveness of the regulations in reducing alcohol-related crime and harm and improving public amenity.
- Impact of the regulations on a range of target groups, including South Australia (SA) Police, residents, traders, local health and community workers, SA Government service providers, marginalised groups and CoA staff working in the Adelaide Park Lands.
- The service landscape delivered by SA Government and social service organisations in response to the Dry Areas.

Approach

The evaluation was conducted from October 2024 to February 2025. The methodology included the collection and analysis of primary and secondary data. The findings are informed by:

- Analysis of documentation and data relating to the regulations (including previous consultation reports and first responder data).
- A desktop scan to map the service landscape in response to Dry Areas.
- Resident feedback as part of the CoA YourSAy consultation conducted September – October 2023.
- Targeted engagement with key stakeholders.

Given the recent 2023 engagement with residents, another CoA engagement poll was not conducted. The 2023 and 2020 consultation feedback from residents, including a resident requested follow-up conversation, was included as part of the analysis.

Interviews were conducted with 26 stakeholders, including those from Aboriginal Community Controlled Organisations (ACCOs), CoA, community organisations, the SA government, SA Police, and traders. Two interviews were conducted with lived experience participants.

Key project limitations included limited quantitative data available to triangulate and assess the effectiveness of the regulations, and the small number of lived experience conversations conducted due to the time of year impacting participation (predominantly organised through service providers) and the transient nature of some participants.

KEY FINDINGS

Evaluation domain	Key findings
Implementation of the regulations	▪ **Overall, the regulations have been implemented well.** Stakeholders agreed on clear roles and good public awareness of the regulations, though some groups, such as young people and visitors, may be less knowledgeable about specific bans. While feedback opportunities were appreciated, decision-making processes regarding the Area 2 24/7 ban – and the underpinning rationale – were sometimes unclear. ▪ **The regulations are viewed as a 'tool' for intervening and reducing alcohol-related crime and harm in the Park Lands.** Stakeholders saw the regulations as important for reducing alcohol-related crime and

Evaluation domain	Key findings
	maintaining public safety. The enforcement approach adopted by SA Police was generally considered appropriate. There was some concern about the effectiveness of tipping out alcohol as an intervention measure given individuals can easily refill their alcohol containers. ▪ **Operation Paragon's approach, inter-agency collaboration and culturally safe gathering places all support the implementation of the regulations.** Operation Paragon officers prioritising support and wellbeing over punitive measures, building authentic relationships, and adapting to emerging priorities were viewed as key enablers of effective implementation. Additionally, strengths of the service system including an inter-agency collaborative approach and the availability of culturally safe gathering places were highlighted. ▪ **Several barriers impact implementation of the regulations.** These include resourcing constraints for SA Police and inconsistent awareness of the regulations among community members. ▪ **There are mixed views about the appropriateness of the Dry Area time span to meet the objectives.** Stakeholders expressed concern about the fairness and rationale behind the inconsistent alcohol ban times in the Park Lands, particularly the 24/7 bans in Area 2, arguing it disproportionately affects certain groups and complicates enforcement. Most preferred the 8pm to 11am ban as a balanced approach.
Effectiveness of the regulations	▪ **There is insufficient quantitative data available to demonstrate the efficacy of the regulations**. Inconsistent data collection and sharing by first responders since 2014 have made it difficult to assess the regulations' effectiveness. As a result, stakeholders have had to rely on limited and anecdotal evidence. ▪ **There are mixed views about the extent to which regulations help to reduce alcohol-related crime and harm and improve public amenity.** Some stakeholders noted a reduction in alcohol-related crime and harm, while others doubted the regulations' impact, and most agreed improvements in public amenity were likely due to relocation of marginalised groups to other areas within Adelaide. ▪ **The regulations alone are insufficient to reduce alcohol-related crime and harm in the Park Lands.** Stakeholders agreed alcohol-related crime and harm in the Park Lands will persist until the underlying drivers relating to substance use, health, housing, and employment were addressed.
Impact of the regulations	▪ **The ability to responsibly consume alcohol in the Park Lands is viewed as important for upholding the personal rights of residents and visitors**. This ability was valued by the general public, with many considering 24/7 Dry Area regulations in all areas of the Park Lands to be an infringement on personal freedoms.

Evaluation domain	Key findings
	▪ **There is concern among some stakeholders that the regulations disproportionately impact marginalised communities**, with many describing how people experiencing homelessness and those from remote communities may be subject to discriminatory enforcement that displaces them from essential services, further complicating their access to specialist supports. ▪ **Most stakeholders agree the removal of the regulations without substantive service reform could have a detrimental impact** on the health of individuals and the experience of the broader community. The role of the regulations to intervene and deescalate problematic drinking was emphasised and valued. ▪ **The regulations provide an increased sense of safety for some stakeholders**, including traders, CoA workers and residents, who believed the regulations enhance safety for workers and users of the Park Lands by allowing police to manage alcohol consumption and mitigate behaviours that impact public perception of safety.

Evaluation domain	Key findings
Service landscape	▪ **There are a range of specialist services to support people experiencing problems with alcohol and drug use in the City of Adelaide local government area.** Over 20 services were identified providing a range of health, alcohol and other drug, housing, sobering up support and Aboriginal specific care. ▪ **Aboriginal rural and remote visitors to the Park Lands face particular challenges in accessing appropriate support.** Rural and remote visitors are disproportionately impacted by the regulations. They have a range of support needs, but face barriers in accessing services, including a lack of services targeted to this group that are in language and culturally safe. ▪ **Resourcing for services is insufficient to meet demand in response to the Park Lands Dry Areas.** Insufficient resourcing of services limits the capacity of services to respond after hours and to undertake assertive outreach. This means the service response after hours tends to be less person centred, trauma informed, and culturally safe. ▪ **A stronger service response is required to better support those impacted by the regulations regardless of whether the regulations are removed.** The regulations themselves are not sufficient to address alcohol-related crime and harm in the Park Lands given its complex and entrenched drivers and should be supported by a more intensive, multiagency service response with culturally appropriate preventative measures and holistic wrap-around support. ▪ **Future approaches should provide culturally safe, wrap-around support to meet the needs of those impacted by the regulations.** Additionally, a strengthened service response would involve better access to alcohol and other drug services and supports, housing and safe spaces, and services that operate after hours.

RECOMMENDATIONS

Based on evaluation findings, there are nine recommended actions to strengthen the response to alcohol-related incidents in the Park Lands. The table overleaf sets out the recommended actions across four themes, the rationale for each action, lead organisation and potential partners, and proposed timing for implementation. The themes are:

- Regulation continuation.
- Strengthen regulation implementation.
- Decision-making informed by robust data and evaluation.
- Early intervention strategies to address the underlying drivers of alcohol consumption and to support better outcomes.

The recommended actions acknowledge the complex drivers of problematic alcohol consumption in the Park Lands and the need for a multiagency, partnership approach to implement meaningful change. The actions have been developed as a suite of complementary and reinforcing strategies, with a strong rationale for implementing all recommendations concurrently.

Table 1 – Recommended actions

Recommended actions	Rationale	Roles and responsibilities	Timing
Regulation continuation			
1. Extend the current regulations for a further three years.	The regulations are generally supported as a useful tool for intervening to reduce alcohol-related harm and to promote public safety. Extending the regulations for a further three years will provide sufficient time for the development and implementation of a robust Data Strategy (see recommended action 6). Any decision to extend the regulations beyond this should be based on a thorough evaluation (see recommended action 7).	**Lead:** Minister for Small and Family Business, Consumer and Business Affairs, and Arts/Consumer and Business Services	2025-2026
2. Assess lifting the 24/7 ban in Area 2 (Parks 20 and 21) to be consistent with the restrictions in Area 1, once the necessary data collection processes are in place (see recommendation 6 below).	A number of stakeholders including local residents have questioned the rationale of the 24/7 ban in Area 2. Any changes to the regulations should be supported by robust data collection arrangements to ensure effective tracking of the impact and efficacy of the change and to provide an evidence base to inform decision making.	**Lead:** Minister for Small and Family Business, Consumer and Business Affairs, and Arts/Consumer and Business Services	After data collection process is established by SA Government and operational
Strengthen implementation regulation			
3. Develop and implement clear guidelines and protocols for the enforcement of the	Responses by SA Police to alcohol-related incidents in the Park Lands may vary	**Lead:** Minister for Police	2025-2026

Recommended actions	Rationale	Roles and responsibilities	Timing
regulations to ensure consistency and minimise biases.	depending upon the officer attending, time of day, location and situation. A standardised protocol is important to ensure consistent implementation of the regulations regardless of the time of day or week and will also assist to manage stakeholder expectations.	**Partners:** SA Police, Safety and Wellbeing Taskforce	
4. Expand resources for Operation Paragon, the dedicated SA Police unit focused on addressing alcohol-related anti-social behaviour through a multi-agency approach, to increase the number of trained officers and to broaden the operational hours of this unit.	There is broad consensus that the relational and harm reduction focus of Operation Paragon delivers positive outcomes for those consuming alcohol in the Park Lands and to the broader community. Resource constraints limit Operation Paragon's ability to attend the Park Lands during weeknights and over the weekends. While all SA Police is responsible for enforcement of the regulations, this recommendation aims to enhance the capacity of Operation Paragon specifically, acknowledging its unique role and approach.	**Lead:** SA Police **Partners:** ACCOs and community organisations	2025-2026
5. Implement a co-design approach to develop a public awareness strategy about the regulations and services available.	Awareness of the regulations is believed to be mixed among people accessing the Park Lands, including young people and rural and remote visitors, particularly those new to Adelaide. A refreshed awareness strategy should include additional or updated signage throughout the Park Lands that indicates the time spans of Dry Areas. The strategy should also consider use of Aboriginal language and	**Lead:** Consumer and Business Services **Partners:** ACCOs, CoA and community organisations	2025-2026

Recommended actions	Rationale	Roles and responsibilities	Timing
	include promotion of specialist services (e.g., youth services, Aboriginal-led services).		
Decision-making informed by robust data and evaluation			
6. Develop a Data Strategy to enhance data collection arrangements and to effectively track the impact of the regulations and other complementary strategies over time. This should be underpinned by a Memorandum of Understanding between relevant parties.	The current understanding of the regulations' effectiveness is limited due to a lack of comprehensive data collection over the past ten years. While qualitative data has provided valuable insights, there is a need for more quantitative data to fully assess the efficacy of the regulations and to inform decision-making about the effectiveness of other supporting strategies. Qualitative and quantitative data are crucial for triangulating findings and developing a holistic understanding of the regulations' effectiveness and impact. A robust Data Strategy will need to articulate purpose, scope and underlying research questions aligned to intended outcomes for different stakeholder groups to inform data collection arrangements and roles and responsibilities, including governance, and formalised data sharing arrangements between partner agencies. Future data collection of alcohol-related incidents in the Park Lands should consider the inclusion of basic demographic data of individuals, the time/date of incidents and exact geographic	**Lead:** Department of Human Services (DHS) **Partners:** SA Police, South Australian Ambulance Service (SAAS), Safety and Wellbeing Taskforce, CoA, community organisations and ACCOs	2025-2026

Recommended actions	Rationale	Roles and responsibilities	Timing
	location. The Data Strategy should align with the broader Evaluation Framework.		
7. Conduct an evaluation of the implementation and effectiveness of the regulations and supporting strategies, commencing at least one year before expiration.	The regulations must be reviewed with due consideration of broader contextual factors and the range of supporting strategies in place. Future evaluations should be informed by improved data collection arrangements and a longer timeline to enable the conduct of stakeholder consultations including those with lived experience of the regulations. Future evaluations may also consider an assessment of the economic costs and benefits of the regulations in conjunction with a range of supporting strategies.	**Lead:** DHS **Partners:** Safety and Wellbeing Taskforce	At least one year before expiration 2026-2027
Early intervention strategies to address the underlying drivers of alcohol consumption and to support better outcomes			
8. In close collaboration with community organisations and ACCOs, further investigate the design and delivery of tailored and intensive wrap-around support services to better support people who access the Park Lands experiencing challenges related to alcohol and other drugs, homelessness and chronic health and wellbeing issues. This should include:	While there are a range of alcohol and other drug, housing and health support services operating in Adelaide, they are currently under resourced to meet the needs of complex and chronic challenges of people who access the Park Lands. In particular, there is currently a lack of assertive outreach services and culturally safe and appropriate services in language.	**Lead:** DHS **Partners:** Community organisations and ACCOs	Commencing 2025-2026

Recommended actions	Rationale	Roles and responsibilities	Timing
▪ assertive outreach services to connect people to relevant supports and provide ongoing case management ▪ support after hours and on weekends ▪ culturally appropriate and safe services for Aboriginal rural and remote visitors including appropriate in-language services			
9. Co-design, with Kaurna Elders and local community, a culturally safe gathering place for Aboriginal people including Aboriginal people from rural and remote areas. The gathering place should provide facilities for visitors and facilitate connections with specialist services (see recommendation 8). The place should be run and managed by Aboriginal organisations in ongoing partnership with the Kaurna community.	There is currently no designated culturally safe place for Aboriginal rural and remote visitors to gather in the CoA local government area. The evaluation of the Puti on Kaurna Yerta, supported by stakeholder consultations, provides evidence of the benefit of an Aboriginal-run gathering space where cultural connection can be fostered and remote visitors can access a range of alcohol and other drug services, housing and specialist supports. There is an opportunity to learn from this model and further promote connection to culture, Country and community which are well-established protective factors for Aboriginal communities.	**Lead:** Safety and Wellbeing Taskforce **Partners:** DHS, CoA, Drug and Alcohol Services South Australia (DASSA)	Commencing 2025-2026

1. INTRODUCTION

Urbis was engaged by the City of Adelaide (CoA) to conduct an evaluation of the Adelaide Park Lands Dry Area Regulations (the regulations).

This document is the draft report for the evaluation. It is structured as follows:

- **Section 1: Introduction** provides an overview of the background and context for the regulations and this evaluation.
- **Section 2: The evaluation** details the purpose, scope, data sources informing this report and the research limitations.
- **Section 3: Implementation** explores the effectiveness of strategies used to implement the regulations and the appropriateness of the Dry Area time span.
- **Section 4: Effectiveness** explores the extent to which the regulations help to reduce alcohol-related crime and harm and improve public amenity.
- **Section 5: Impact** explores the impact of the regulations on a range of target groups who interact with the Park Lands.
- **Section 6: Service landscape** explores the services and supports available for people impacted by the regulations, including gaps in service provision.
- **Section 7: Conclusion and recommendations** provides a summary of evaluation findings and recommendations for implementation of the regulations.

1.1. THE ADELAIDE PARK LAND DRY AREA REGULATIONS

Context

THE ADELAIDE PARK LANDS

The Adelaide Park Lands (the Park Lands) are a network of parks which enclose and separate the City of Adelaide from the suburbs, comprising 29 individual parks and six city squares (City of Adelaide, n.d.-a). The *Adelaide Park Lands Management Strategy: Towards 2036* describes the significance of the Park Lands in creating a healthy, respectful and vibrant lifestyle for Adelaide and South Australia (SA), by providing connections to nature and offering places for people to participate in events, cultural experiences, sporting and recreational activities (City of Adelaide, n.d.-a).

The Park Lands include a diverse range of open spaces, landscapes, community buildings, play spaces, facilities and businesses (including hospitality venues) designed to support the diverse needs of community members and visitors. The Park Lands are used by a variety of groups, spanning sports and recreation groups, schools, local residents, tourists, Aboriginal people (including those visiting from rural and remote communities) and people experiencing homelessness (City of Adelaide, 2014; City of Adelaide, 2023a).

DRY AREAS

Alcohol-free zones or dry areas prohibit the consumption and possession of alcohol in designated public spaces. Dry areas aim to curb anti-social behaviour and other alcohol-related issues in places such as reserves, shopping precincts, car parks and beaches (Government of South Australia, 2014).

Dry areas are often focused on geographic areas where public drinking is linked to complex social issues, such as social displacement and marginalisation, homelessness, health, mental health, community safety and cultural factors (Department of Health, 2019). The Adelaide city streets and squares have been permanent (24/7) dry areas since 2001 (City Community Services and Culture Committee, 2023).

THE REGULATIONS

The regulations have been in place since 2014, when they were established as a trial to address the impacts of alcohol-related behaviour in the Park Lands for the local community (City of Adelaide on 24/06/2014 City Wide Dry Area Review, 2014). The 2014 regulations restricted possession or consumption of alcohol between 8.00pm to 11.00am daily across the Park Lands. On 20 December 2019, a trial 24/7 alcohol ban was introduced in two southern parks: Blue Gum Park/Kurangga (Park 20) and Veale Park/Walya Yarta (Park 21) for three months. This was then extended for a further 28 days to expire on 17 April 2020 (City of Adelaide, 2020).

In 2021 a review was completed to extend the regulations for a further two years to 2023 (City of Adelaide, n.d.-b). In 2023, Council endorsed an application to the SA Government to extend the regulations to June 2025. As shown in Figure 1, the specific regulations currently in place are:

- Adelaide Park Lands Dry Area 1, which has been in place since 2014, is in effect from 8.00pm to 11.00am the following day, seven days per week, covering most of the Adelaide Park Lands.
- Adelaide Park Lands Dry Area 2, which was introduced in 2021 (City Community Services and Culture Committee, 2023) and covers Blue Gum Park/Kurangga (Park 20) and Veale Park/Walya Yarta (Park 21), is in effect for 24 hours a day, seven days a week (City of Adelaide, n.d.-b).[2]

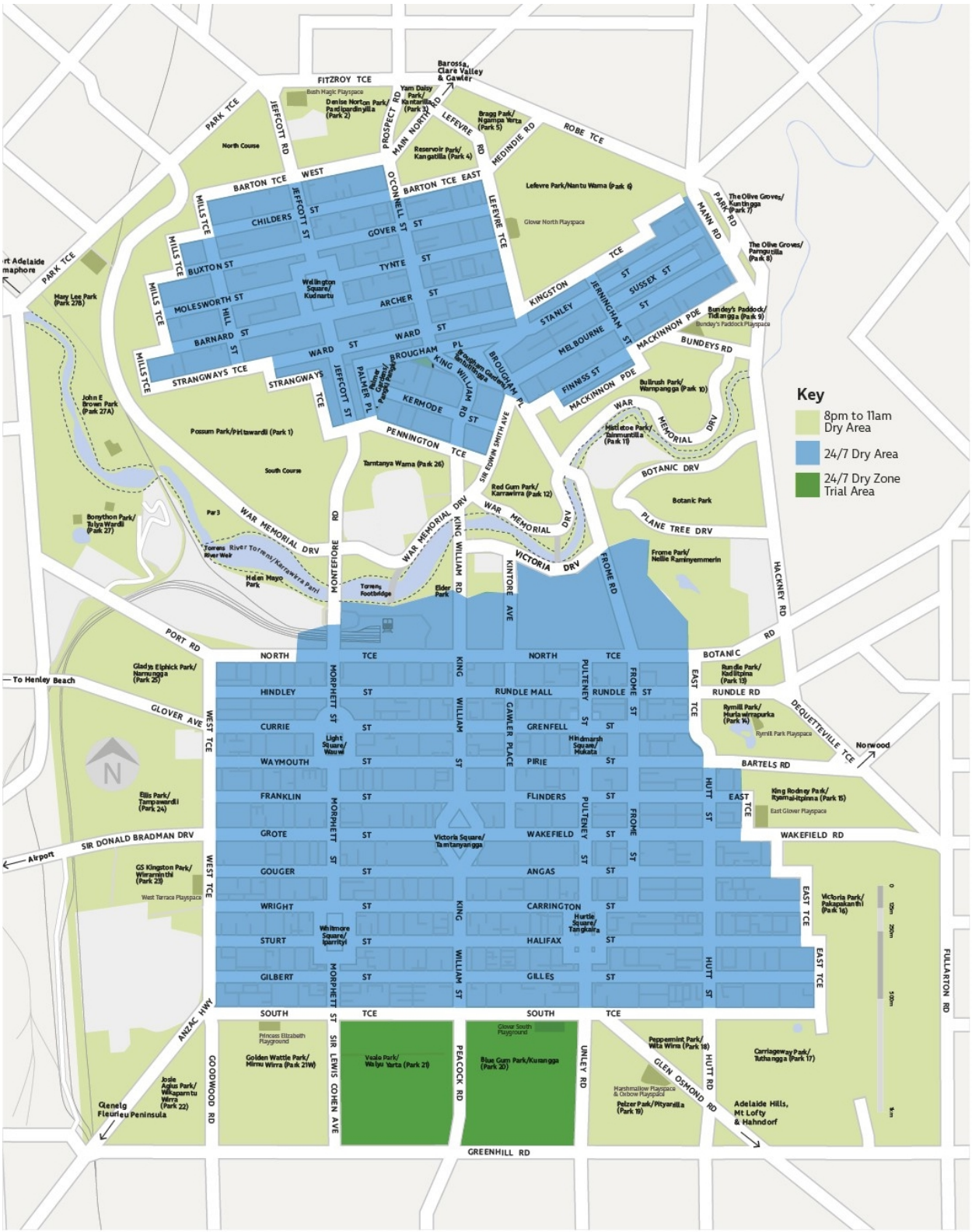
The purpose of the regulations is to curb alcohol-related problems in the Park Lands. The regulations help CoA to manage the use of the Park Lands and provide safe and accessible spaces for recreation and activities such as walking, running, quiet contemplation, picnicking and gathering socially (City of Adelaide, 2023a).

The regulations make it illegal to consume alcohol or carry an open liquor container in a designated public space. Those wishing to consume alcohol during the times that an area is designated as a Dry Area, including as part of an event, can apply for a liquor licence through the State Government Consumer and Business Services (City of Adelaide, n.d.-b).

SA Police are responsible for monitoring and enforcing the Dry Areas. Anyone who has or drinks alcohol in a Dry Area can be fined up to $1,250 or be given an on-the-spot fine of $160 (SA Government, 2025). SA Police have the option to tip out open alcohol containers and issue a warning rather than a fine (City Community Services and Culture Committee, 2023).

[2] The regulations apply only to the individual parks within the Park Lands, and not to the city squares, which are permanent dry areas.

Figure 1 – Adelaide Park Lands Dry Areas



Source: CoA

Drivers of alcohol consumption in the Park Lands

The drivers of alcohol consumption in the Park Lands by different groups vary widely and are influenced by a range of social, cultural and economic factors. For some, the Park Lands offer open spaces to enjoy a drink with friends or family, like a picnic or social outing.

For community members such as young people and people experiencing homelessness or sleeping rough, the relative accessibility and openness of the Park Lands make it a convenient location for individuals who may not have access to private spaces in which to consume alcohol. For many Aboriginal people, including those visiting from rural and remote communities, the Parks Lands provide a gathering place for socialising, cultural connection, camping and community bonding. This is discussed further below.

Understanding Park Lands usage by rural and remote visitors

Aboriginal people travel from rural and remote communities primarily in SA and the Northern Territory to Adelaide for a variety of reasons, including access to services (e.g., specialist health services and hospitals), to move away from high temperatures and policy restrictions in their home communities (such as alcohol restrictions and income management), and for family, cultural and community obligations (City of Adelaide, 2020). For many visitors, a lack of access to accommodation and housing contributes to sleeping rough/camping in the Park Lands (as well as for other people experiencing homelessness). Distinct from the typical understanding of rough sleeping in homelessness discourse, socialising and camping in parks for Aboriginal visitors and community members is additionally informed by cultural connections to camps and to the land (Tually et al., 2022).

The consumption of alcohol in the Park Lands by this group must be understood through a historical lens. It is well established within the literature that policies and practices stemming from colonisation have ongoing impacts on patterns of alcohol consumption amongst Aboriginal people and on related police interactions. For example, the exchange of alcohol for labour in the early colonial period and laws that banned Aboriginal people from public spaces led to practices of rapid and excessive drinking, which is understood to have influenced current drinking patterns (d'Abbs & Hewlett, 2023; Gray et al., 2018). The impact of intergenerational trauma on addictive behaviours is also emphasised within the literature (d'Abbs & Hewlett, 2023; Gray et al., 2018). While this history is not the sole cause of harmful alcohol use among Aboriginal people, it illustrates some of the entrenched drivers contributing to harmful drinking behaviours.

The history of policing in Australia is also essential to understanding how the regulations are perceived and enforced. Policing has been a significant instrument of colonisation and historically the relationship between police and Aboriginal people has been one of tension, violence and control (Nettelbeck & Ryan, 2018). This fraught relationship stems from a legacy of discrimination, including the enforcement of policies that displaced Aboriginal people from their lands, placed legal restrictions on their movement between regions and otherwise prohibited their participation from aspects of public life (Dockery & Colquhoun, 2012). These actions fostered a pervasive mistrust of law enforcement within Aboriginal communities that provides important context for understanding contemporary interactions between police and Aboriginal people and how the regulations are perceived by Aboriginal communities, who may view them as extensions of historical oppression rather than protective measures.

Community and stakeholder views on the regulations

Several rounds of consultation conducted by CoA have demonstrated the polarity of views held by community and stakeholders regarding the regulations since they were introduced. Consultation undertaken in 2014 found that continuation of the city-wide Dry Area (beginning 2001 and expiring 2014, and excluding the Park Lands) was supported by many community members, but its extension into the Park Lands was opposed by social services and Aboriginal representatives (City of Adelaide on 24/06/2014 City Wide Dry Area Review, 2014). Consultation undertaken in 2023 to inform the future of the regulations found equally mixed responses both supporting or opposing

continuation and showing varying preferences for potential timelines for continuation (City of Adelaide, 2023a).

A key theme that arose from the 2023 consultation was that the regulations are not an adequate solution to alcohol-related anti-social behaviour in the Adelaide Park Lands. Those who participated in the consultation described the need for long-term solutions to support the complex social needs of vulnerable people occupying the Park Lands, such as culturally appropriate preventative measures and holistic wrap-around support services. Some respondents also felt the regulations disproportionately impacted vulnerable groups without access to housing, primarily Aboriginal people visiting from rural and remote communities and people experiencing homelessness.

Strategies to minimise negative impacts of the regulations

In recognition of these concerns, strategies have been undertaken to minimise the negative impacts of the regulations as a punitive response, including the provision of services and supports to these groups. The cross-government Safety and Wellbeing Taskforce was established in 2021 by the SA Government to provide culturally safe support to those Aboriginal visitors coming to the Park Lands from remote communities. The role of the Taskforce, as set out in its Terms of Reference, is to be the lead mechanism and accountable body to develop strategies and sustainable, place-based responses that ensure the safety and wellbeing of remote Aboriginal visitors (and those around them) in Adelaide and other regional centres.

In response to a surge in visitors due to COVID-19 restrictions, the Taskforce established Puti on Kaurna Yerta (Bush in the City), a temporary multi-agency service hub in the southern Park Lands which operated from October to December 2021. In 2023, following the success of Puti on Kaurna Yerta and in response to significant unmet need, Safer Place to Gather, a temporary services hub, was established in Kingston Park / Wirrarninthi (Park 23). It is operated by the Department of Human Services (City of Adelaide, n.d.-c).

1.2. EVALUATION DRIVERS

While the regulations have been in operation for ten years, their effectiveness is not well understood. The SA Government and CoA have committed to monitoring and evaluating the regulations to understand their implementation, effectiveness and impact on a range of stakeholders including potentially vulnerable groups such as Aboriginal and Torres Strait Islander people, people experiencing homelessness and rough sleeping, young people aged 18 to 25 years, SA Police, residents, traders, local health and community works and CoA staff.

In November 2024, CoA engaged Urbis to undertake an independent evaluation of the regulations. Urbis partnered with Indigenous social change agency, Cox Inall Ridgeway (CIR), to develop the research instruments and communications collateral for the Aboriginal Community Controlled Organisation (ACCO) and lived experience consultations. CIR provided input into analysis and reporting to ensure the cultural relevance of findings and recommendations.

2. THE EVALUATION

2.1. PURPOSE AND SCOPE

The purpose of the evaluation was to understand the effectiveness and impact of the regulations, and to provide recommendations about their continuation and potential alternative measures that support positive outcomes for all community members and stakeholders.

The evaluation aimed to assess:

- Implementation of the regulations (i.e., the strategies used in the implementation, the effectiveness of these strategies, the appropriateness of the Dry Area time span and the barriers and enablers to successful implementation) over at least the past 12 months. Earlier implementation will be considered as relevant.
- Effectiveness of the regulations in reducing alcohol-related crime and harm and improving public amenity.
- Impact of the regulations on a range of target groups, including SA Police, residents (based on existing information), traders associated with the Adelaide Park Lands, local health and community workers, SA Government service providers, marginalised groups including Aboriginal and Torres Strait Islander people, people experiencing homelessness and rough sleeping, young people (18-25 years of age), and CoA staff working in the Adelaide Park Lands.

The evaluation also sought to understand the current wrap-around service supports delivered by SA Government and social service organisations in response to the Dry Areas.

The scope of the evaluation did not include consultation with residents as their feedback has been captured through previous CoA community engagement processes, most recently in 2023. The evaluation focused on the implementation of the regulations over the past five years (since 2019) due to data availability, however earlier implementation was also considered as relevant.

The evaluation was undertaken over a four-month period from October 2024 to February 2025, with stakeholder consultations conducted in December 2024 and January 2025.

2.2. EVALUATION QUESTIONS

The table below sets out the evaluation questions that were used to guide the evaluation.

Table 2 – Evaluation domains and questions

Evaluation domain	Evaluation questions
Implementation Implementation of the Adelaide Park Lands Dry Area Regulations (i.e., the strategies used in the implementation, the effectiveness of these strategies, the appropriateness of the Dry Area time span and the barriers and enablers to successful implementation) over at least the past 12 months. Earlier implementation will be considered as relevant.	▪ What strategies have been used in the implementation of the regulations? (e.g., enforcement, communications and awareness, administration, resources and training, decision making processes) ▪ What other strategies and services support the implementation of the regulations? ▪ How well have the regulations been implemented? ▪ What have been the barriers and enablers to successful implementation of the regulations? ▪ How appropriate is the Dry Area time span to meet the objectives?
Effectiveness Effectiveness of the Adelaide Park Lands Dry Area Regulations in reducing alcohol-related crime and harm and improving public amenity.	▪ To what extent do the regulations help to reduce alcohol-related crime and harm? ▪ To what extent do the regulations help to improve public amenity?
Impact Impact of the Adelaide Park Lands Dry Area Regulations on a range of target groups, including SA Police, residents, traders, community organisations, SA Government service providers, marginalised groups and CoA staff working in the Adelaide Park Lands.	▪ What is the impact (positive and negative) of the regulations on the target groups? ▪ To what extent do the regulations address and balance the perspectives of different groups? ▪ Are there any unintended consequences from the regulations? ▪ What would be the impact of removing the regulations for the different target groups? ▪ If the regulations are removed, what alternatives are there? ▪ Do the benefits of implementing the regulations outweigh the associated costs?
Service landscape Available wrap-around service supports delivered by SA Government and social service organisations in response to the Dry Areas.	▪ What is the current service and support landscape for people experiencing problems with alcohol or drug use in Adelaide? ▪ What additional services and supports would need to be established/expanded if the regulations were removed?

2.3. METHODOLOGY

Overview

The evaluation was conducted from October 2024 to February 2025 over three stages:

- **Stage 1: Project inception and planning** (Oct – Nov 2024) included commencement of stakeholder recruitment by CoA, inception meeting, knowledge review, and development of a project plan (including research instruments) to guide the evaluation.
- **Stage 2: Data collection and analysis** (Nov 2024 – Jan 2025) included service system mapping, stakeholder recruitment, stakeholder interviews and secondary data analysis.
- **Stage 3: Reporting** (Jan – Feb 2025) includes data synthesis and triangulation, emerging findings workshop with CoA and development of a draft and final report.

Data sources and analysis

The data sources and analysis informing this report are described in the below table.

Table 3 – Data sources

Data source	Detail
Stakeholder interviews	Urbis conducted semi-structured interviews with stakeholders whose role intersects with the regulations. A total of 37 relevant stakeholders were identified by CoA and invited to take part in the evaluation. Of these, 26 stakeholders took part in interviews, exceeding the initial target of 25 stakeholders. This included: ▪ Aboriginal Community Controlled Organisations (ACCOs) (n=4 staff from 2 organisations). ▪ Community organisations (n=4 staff from 4 organisations). ▪ Safety and Wellbeing Taskforce members (n=4). ▪ CoA staff working in the Park Lands (n=4) and CoA managers with a historical perspective on the regulations (n=2). ▪ Traders operating in or near the Park Lands Area 22F[3] (n=3 traders from two businesses). ▪ SA Health (n=3 staff). ▪ SA Police (n=2 staff from 2 branches). Urbis developed tailored discussion guides for each stakeholder group, with input from CIR. Depending on their role, stakeholders were asked about the implementation, effectiveness and impact of the regulations, and the service landscape in response to the Dry Areas. Interviews were conducted one-on-one or in small groups and hosted online using Microsoft Teams. With consent, the interviews were electronically recorded and transcribed. Interviews were analysed using thematic and content analysis techniques.

[3] Traders in the Park Lands Area 1 were contacted but did not participate.

Data source	Detail
Lived experience interview transcripts	CoA conducted semi-structured interviews with people with lived experience who use the Park Lands. CoA worked with ACCOs, community organisations and the SA Government to identify participants to take part in consultations. A total of 18 potential participants were identified and invited to take part in the evaluation, including people with lived experience of homelessness and people sleeping rough, young people (18 to 25 years of age) and Aboriginal and Torres Strait Islander people. Of these, 2 people took part in interviews, falling short of the initial target of 6-8. This included: ▪ Young person (n=1). ▪ Aboriginal Elder (n=1). Urbis developed the discussion guides with input from CIR. Participants were asked about their awareness of the regulations, the impact of the regulations, and opportunities for improvement. Interviews were conducted face-to-face by a CoA staff member. With consent, the interviews were electronically recorded and transcribed and the transcripts were provided to Urbis for analysis. Interviews were analysed in qualitative data analysis software NVivo using thematic and content analysis techniques.
Document and data review	Urbis reviewed documentation and data provided by CoA and publicly available documentation relating to the regulations, including council reports and consultation summaries from 2014, 2020 and 2023, individual submissions from the 2023 council consultation and evaluation reports. The purpose of this review was to provide insight into the context and key decision points for the regulations, and provide insight, implementation, effectiveness and impact of the regulations. Documentation was analysed in NVivo using thematic and content analysis techniques.
Service mapping	Urbis conducted a desktop scan of publicly available information regarding service responses for people experiencing problems with alcohol or drug use in Adelaide, as well as any relevant documentation provided by CoA. Service responses were mapped against key features such as service type, target group/s, geographic area etc. The information obtained through the scan was supplemented and validated during the stakeholder consultations. Key findings from the service mapping are included in Section 6, and the full results are provided in Appendix A.
First responder data	Up-to-date first responder data was sought from SA Police and the SA Ambulance Service (SAAS) to understand the number of alcohol-related incidents in and around the Park Lands Dry Areas, and any changes over time in service demand. CoA requested SA Police data from 2019 to 2024 and was provided with data spanning January 2022 to October 2024. Data points were provided for each month and included: ▪ Number of expiation notices issued for offences of consuming or possessing liquor in a dry area during hours of prohibition.

Data source	Detail
	▪ Number of crime occurrences relative to offences associated with alcohol-related crime and anti-social behaviour. ▪ Number of police taskings relative to anti-social behaviour. ▪ Number of Public Intoxication Act detentions in which a person can be detained for the purpose of being taken to a place where someone is willing and able to care for them. SA Police advised that while the data can be referenced, specific items cannot be reported in detail to protect confidentiality. CoA requested SAAS data to 2024. The organisation's 'Submission to the Review of the Adelaide City Park Lands Dry Area Regulation', which included SAAS analysis of incident data spanning 2012 to 2022, has been used to understand ambulance service demand. Data points were provided for each year (broken down by whether the incident occurred between 8:00pm to 10:59am or between 11:00am to 7:59pm) and included: ▪ Number of SAAS incidents across all Park Lands each year. ▪ Number of SAAS incidents in Parks 20 and 21 each year. ▪ Number of drug and alcohol-related incidents in Park Lands each year. ▪ Number of drug and alcohol-related incidents in Parks 20 and 21 each year. In February 2025, SAAS provided the following additional data to CoA: ▪ Number of SAAS incidents in Parks 20 and 21W each year (2014-2024). ▪ Number of drug and alcohol-related incidents in Parks 20 and 21W each year (2016-2022). Additional data provided did not include data relating to Park 21, nor did it include drug and alcohol-related incidents throughout the whole of the Park Lands.

Limitations

The following limitations should be considered when reading this report:

- There was limited quantitative first responder data available to assess the effectiveness of the regulations in reducing alcohol-related crime and harm over time. As such, findings draw on stakeholder consultations and previous stakeholder engagement conducted by CoA, and stakeholders' views on the impact and effectiveness of the implementation are largely anecdotal.
- Primary data collection was conducted within a short timeframe from November 2024 to January 2025. As a result, a small number of stakeholders were not available to take part in interviews with the evaluation team. Multiple attempts were made by CoA to increase participation of ACCOs and people with lived experience in interviews, however only a small number from these stakeholder groups took part (2 ACCOs from a target of 5, and 2 people with lived experience from a target of 6-8). Given the number of organisations and individuals who may hold views on the regulations, findings are not representative of all relevant stakeholders.
- In some instances, stakeholders within the same organisation shared different views on the effectiveness and impact of the regulations. This limits the ability to generalise or ascribe views to stakeholder groups or organisations.
- Service mapping was undertaken via a desktop scan of publicly available information and supplemented with stakeholder input. There was variation in the completeness and availability of information pertaining to each service. Attempts were made to gather as much information about the service landscape as possible within the timeframe, however some details could not be verified. Where information was not able to be identified, this is indicated by 'Information not available' (see Appendix A).
- As detailed in Section 1.1, the problem of alcohol-related crime and harm in the Park Lands, and the role of the regulations in addressing this harm, must be understood not as an isolated issue but one that has arisen from and is driven by a variety of intersecting factors. This is important context for the evaluation findings.

3. IMPLEMENTATION OF THE REGULATIONS

KEY FINDINGS

- **Overall, the regulations have been implemented well.** Stakeholders agreed on clear roles and good public awareness of the regulations, though some groups, such as young people and visitors, may be less knowledgeable about specific bans. While feedback opportunities were appreciated, decision-making processes regarding the Area 2 24/7 ban – and the underpinning rationale – were sometimes unclear.
- **The regulations are viewed as a 'tool' for intervening and reducing alcohol-related crime and harm in the Park Lands.** Stakeholders saw the regulations as important for reducing alcohol-related crime and maintaining public safety. The enforcement approach adopted by SA Police was generally considered appropriate. There was some concern about the effectiveness of tipping out alcohol as an intervention measure given individuals can easily refill their alcohol containers.
- **Operation Paragon's approach, inter-agency collaboration and culturally safe gathering places all support the implementation of the regulations.** Operation Paragon officers prioritising support and wellbeing over punitive measures, building authentic relationships, and adapting to emerging priorities were viewed as key enablers of effective implementation. Additionally, strengths of the service system including an inter-agency collaborative approach and the availability of culturally safe gathering places were highlighted.
- **Several barriers impact implementation of the regulations.** These include resourcing constraints for SA Police and inconsistent awareness of the regulations among community members.
- **There are mixed views about the appropriateness of the Dry Area time span to meet the objectives.** Stakeholders expressed concern about the fairness and rationale behind the inconsistent alcohol ban times in the Park Lands, particularly the 24/7 bans in Area 2, arguing it disproportionately affects certain groups and complicates enforcement. Most preferred the 8pm to 11am ban as a balanced approach.

This section addresses the following evaluation questions:

- What strategies have been used in the implementation of the regulations? (e.g., enforcement, communications and awareness, administration, resources and training, decision making processes)
- What other strategies and services support the implementation of the regulations?
- How well have the regulations been implemented?
- What have been the barriers and enablers to successful implementation of the regulations?
- How appropriate is the Dry Area time span to meet the objectives?

OVERALL, THE REGULATIONS HAVE BEEN IMPLEMENTED WELL

Stakeholders consulted for the evaluation generally agreed the regulations have been implemented effectively. Almost all considered roles and responsibilities of stakeholders involved in implementation were clearly defined, and there is good public awareness about the regulations

within the community. It was suggested, however, that some community members – including young people, tourists and rural and remote visitors – may be less aware of the specific regulations, particularly the 24/7 ban in Parks 20 and 21.

Some stakeholders from SA Government and ACCOs/community organisations reflected positively on opportunities to provide feedback and input on the regulations, including through this evaluation and previous reviews. It was noted however, that decision-making processes and particularly the decisions to introduce and extend the 24/7 ban in Parks 20 and 21, were not always clear.

The table below summarises key strategies and stakeholder roles in the implementation of the regulations.

Table 4 – Implementation strategies and roles

Strategy	Stakeholder roles
Decision making	CoA is responsible for making informed decisions regarding the recommended continuation, amendment or removal of the regulations based on data and community feedback. The SA Government is responsible for approving amendments to the regulations requested by CoA. The approval process for Adelaide Park Lands Dry Areas is: ▪ Council makes an application to SA Government via Consumer and Business Services. ▪ The Liquor and Gambling Commissioner reviews the application and makes a recommendation to the Minister for Consumer and Business Affairs. ▪ If approved by the Minister, Dry Areas are made public by notice in the Government Gazette.
Administration	CoA is responsible for managing the administrative aspects of implementation of the regulations, including record-keeping, reviewing the regulations, community engagement, requesting amendments to the regulations and coordination with other stakeholders. The SA Government is responsible for considering amendments to the regulations and coordination with other stakeholders.
Communications and awareness	CoA is responsible for ensuring awareness of the regulations among stakeholders and the community through online content and communications materials. Other organisations (including SA Government, community organisations and ACCOs) also have a role in spreading awareness of the regulations.
Enforcement	SA Police is responsible for enforcing the regulations, responding to information provided by the public, ensuring compliance and addressing breaches. CoA is responsible for encouraging compliance through awareness raising and reporting violations at their discretion (e.g., staff working in the Park Lands).

Strategy	Stakeholder roles
Resources and training	SA Police is responsible for training their officers to enforce the regulations. CoA may also provide training and resources to its staff to support awareness and compliance efforts. Other stakeholders (including SA Government, community organisations and ACCOs) may also provide training and resources to their staff to support people impacted by the regulations.

Source: Stakeholder interviews and documentation provided by CoA

THE REGULATIONS ARE VIEWED AS A 'TOOL' FOR INTERVENING AND REDUCING ALCOHOL-RELATED CRIME AND HARM IN THE PARK LANDS

Many stakeholders viewed the regulations as an important tool for intervening and reducing alcohol-related crime and harm and maintaining safety in the Park Lands. The regulations provide a clear legal framework that empowers SA Police to intervene in situations where alcohol consumption may lead to anti-social behaviour or crime. This legal basis provides officers with powers to issue expiation notices, warnings and move-on orders to individuals found in violation of the regulations. Officers also have the authority to search individuals they suspect are in violation of the regulations and to make arrests where there is a significant threat to public safety.

Stakeholders reported that in practice, SA Police officers rarely exercise these powers to enforce the regulations. Instead, they use their discretion and where it is deemed necessary, they may opt to obtain the details of individuals and tip out alcohol, while also assessing their need for referral to relevant social services. It was noted that many of the individuals who routinely violate the regulations would be unable to pay fines issued, and a more punitive approach would likely do more harm than good. This approach was viewed by most as appropriate to prevent potential escalation and the need for more intensive crisis responses.

> [Police are] able to utilise [regulations] when they want to… if you behave yourself, they tend to let things slide. – CoA stakeholder

This is reflected in data provided by SA Police spanning January 2022 to October 2024, which showed relatively low rates of enforcement in the Park Lands when compared to the wider Adelaide CBD. However, South Australian Computer Aided Dispatch (SACAD) police tasking in the Park Lands (specifically in relation to anti-social behaviour) has increased more considerably in the Park Lands than it has across the broader CBD area in the same period.

However, there were some concerns raised about the effectiveness of simply tipping out alcohol, as individuals can easily refill their containers. The use of the regulations as a 'tool' for managing anti-social behaviour is described further in Section 5.

OPERATION PARAGON'S APPROACH, INTER-AGENCY COLLABORATION AND CULTURALLY SAFE GATHERING PLACES ALL SUPPORT THE IMPLEMENTATION OF THE REGULATIONS

Operation Paragon

Operation Paragon is a dedicated SA Police unit focused on addressing alcohol-related anti-social behaviour through a multi-agency approach (Government of South Australia, 2023). It helps to facilitate access to support services that address the health and welfare needs of at-risk individuals in the community (Government of South Australia, 2023). Stakeholders including ACCOs consistently praised the relational approach of Operation Paragon, with one stakeholder

highlighting their commitment to being “part of the solution, not the problem” and keeping people out of custody.

Operation Paragon officers are chosen for their ability to build authentic relationships with community members and other agencies. Stakeholders provided examples of this approach, such as officers getting to know individuals in the Park Lands by name, participating in community events, building relationships with social services and making referrals. In the context of limited resourcing and a small team, Operation Paragon activities shift in response to emerging priorities, such as increasing patrols in response to rising incidents in the CBD or reallocating resources to support initiatives such as Puti on Kaurna Yerta and Safer Place to Gather.

> [Paragon is] strongly focused on relationship building... they're very proactive and engaging with people in a non-stigmatising way. I think [Paragon]... is a unique offering. – Community organisation stakeholder

Operation Paragon collaborates closely with various agencies, including the CoA, DHS, community organisations and ACCOs to support vulnerable people in the Park Lands. A shift in policing culture was noted by one stakeholder as moving from an enforcement-based approach to one that prioritises the wellbeing of vulnerable community members. Instead of punitive actions like fines and arrests, Operation Paragon focuses on what one stakeholder described as “*preventative measures*” such as tipping out alcohol and engaging with individuals to understand their needs and address the root causes of anti-social behaviour.

> In the last 6 to 9 months, we've changed the focus [of the Paragon team] … to collaborative stakeholder engagement rather than an enforcement focus. From a relationship point of view, it is better for Paragon to not have a high enforcement focus or to wield a big stick. It's better for them to get to get to know people, to have those ongoing relationships. – SA Police stakeholder

Inter-agency collaboration

Collaboration between agencies to support people impacted by the regulations is an important enabler of implementation. Most stakeholders expressed goodwill and a strong commitment to work together to address complex social issues that contribute to alcohol-related harm in the Park Lands. Several stakeholders noted the establishment of the Safety and Wellbeing Taskforce has been positive in coordinating efforts to better support rural and remote visitors. The Taskforce has facilitated communication and cooperation between different agencies, enhancing the overall effectiveness of the regulations.

Providing safer places for rural and remote visitors

Stakeholders noted the importance of providing culturally safe and welcoming places for rural and remote visitors to gather, engage in cultural activities, socialise and camp while in Adelaide. It was noted initiatives such as Puti on Kaurna Yerta can help to reduce breaches of the regulations and promote service access among potentially vulnerable visitors. This is discussed further in Section 6.

> Aboriginal community have been asking for some sort of safe space within the Park Lands for as long as I've been around. – ACCO/community organisation stakeholder

SEVERAL BARRIERS IMPACT IMPLEMENTATION OF THE REGULATIONS

Resourcing constraints

Limited resources have constrained the ability of Operation Paragon (and SA Police more broadly) and support services to ensure comprehensive enforcement of the regulations and fully address the needs of the community. Stakeholders commonly reported this led to gaps in service provision and inconsistent enforcement, undermining the overall effectiveness of the regulations. This is discussed further in Section 5.

> Even though they are intoxicated… the [Mobile Assistance Patrol (MAP) bus] couldn't pick them up because there's no capacity in the MAP [bus]. – ACCO/community organisation stakeholder

Inconsistent awareness of the regulations

Stakeholders suggested some community members may not be fully aware of the specific regulations and particularly the 24/7 alcohol ban in Parks 20 and 21. One lived experience interviewee described that they were not aware of the time spans of the regulations and highlighted the need for additional signage.

> I don't think I actually knew what the regulations fully were and what areas were not dry zones… I wouldn't have told you off the top of my head and I don't think I could even recollect seeing any signs near the parks that I used to frequent. – Lived experience stakeholder

THERE ARE MIXED VIEWS ABOUT THE APPROPRIATENESS OF THE DRY AREA TIME SPAN TO MEET THE OBJECTIVES

As outlined in Section 1.1, the current regulations prohibit alcohol consumption in the Park Lands from 8.00pm to 11.00am the following day, seven days a week. This applies to all parks, except Blue Gum Park/Kurangga (Park 20) and Veale Park/Walya Yarta (Park 21), where the ban is in effect for 24 hours a day, seven days a week. The inconsistency in the time spans of the Dry Areas across different parks was a point of contention among stakeholders consulted for the evaluation and in the 2023 consultation.

Some stakeholders questioned why these two parks have a 24/7 ban while others do not, and whether this is justified by specific issues or data. Critics of the 24/7 ban argued that it disproportionately affects certain groups such as Aboriginal people and those experiencing homelessness and suggested that such stringent measures could push alcohol consumption into less visible and potentially more dangerous areas, rather than addressing the underlying drivers of alcohol-related harm (as will be discussed further in Section 5).

The inconsistency in time spans raises questions about the fairness and equity of the regulations, as different parks are subject to different rules without a clear and transparent rationale. It was also noted as potentially contributing to confusion among park users and complicating enforcement efforts by SA Police. While a small number of stakeholders believed a 24/7 ban should be applied across all Park Lands, most were of the view that this would be too restrictive and limit the enjoyment of the Park Lands, and felt the 8pm to 11am ban struck the right balance in meeting the objectives without unduly impacting the community.

> Having a time frame on the dry zone regulations is not ideal from a policing perspective… sometimes the group of people causing the most issues are well aware of what the times are and they are of the belief [police] can't act during those times. – SA Police stakeholder

4. EFFECTIVENESS OF THE REGULATIONS

KEY FINDINGS

- **There is insufficient quantitative data available to demonstrate the efficacy of the regulations**. Inconsistent data collection and sharing by various agencies, including first responders and CoA, since 2014 have made it difficult to assess the regulations' effectiveness. As a result, stakeholders have had to rely on limited and anecdotal evidence.
- **There are mixed views about the extent to which regulations help to reduce alcohol-related crime and harm and improve public amenity.** Some stakeholders noted a reduction in alcohol-related crime and harm, while others doubted the regulations impact, and most agreed improvements in public amenity were likely due to relocation of marginalised groups to other areas within Adelaide.
- **The regulations alone are insufficient to reduce alcohol-related crime and harm in the Park Lands.** Stakeholders agreed alcohol-related crime and harm in the Park Lands will persist until the underlying drivers relating to substance use, health, housing, and employment were addressed.

This section addresses the following evaluation questions:

- To what extent do the regulations help to reduce alcohol-related crime and harm?
- To what extent do the regulations help to improve public amenity?

THERE IS INSUFFICIENT QUANTITATIVE DATA AVAILABLE TO DEMONSTRATE THE EFFICACY OF THE REGULATIONS

Inconsistent data collection and data sharing arrangements have been in place since the introduction of the regulations in 2014, making it challenging to determine trends and assess patterns in occurrence of alcohol-related incidents in and around the Dry Areas and any changes over time. All stakeholders interviewed had low confidence in their ability to assess the efficacy of the regulations, citing limited data availability and reliance on anecdotal evidence and observations. This related to the efficacy of both the 24/7 bans in Parks 20 and 21 and the 8pm-11am ban throughout the remainder of the Park Lands.

The most complete quantitative data set available is that captured by SAAS between 2012 and 2022. This was strengthened by updated SAAS data showing total incidents throughout Parks 20 and 21 from 2014-2024. Data for total drug/alcohol-related incidents in Parks 20 and 21 was unavailable for 2023 and 2024. While SAAS data shows a moderate reduction in the number of drug and alcohol-related incidents in Parks 20 and 21 in 2022 following the implementation of 24-hour dry areas in 2021, this data has the following limitations:

- Data relates to how cases (incidents) were categorised at the time of the triple zero call, meaning the nature of each incident may have been misidentified.
- A spike in incidents during 2021 due to the COVID-19 pandemic and travel restrictions, which prevented remote visitors from returning to Country, may have impacted the strength of data collected.

- This was acknowledged by SAAS, who hypothesise the increase in SAAS incidents in 2021 likely related to the establishment of Puti on Kaurna Yerta in Park 21 and the ability for people to access ambulance services to address health needs.
- SAAS data collection methods did not differentiate between attendances for drug use, alcohol use, or a combination of both, meaning the demand on SAAS caused by alcohol consumption alone could not be established.

Ultimately, SAAS supported extension of the regulations while acknowledging a need for 'cleaner' data capture, particularly given COVID-19 restrictions have been lifted.

Quantitative data provided by SA Police spanned January 2022 to October 2024. This data indicated an increase in police taskings for the Park Lands compared to the rest of the Adelaide CBD, however the limited timespan of data makes observations of general trends for other data points difficult. Further, data provided does not differentiate between Parks 20 and 21 and all other areas within the Park Lands. As data provided commences in 2022, there is no baseline data available to understand how the establishment of a 24-hour Dry Area in Parks 20 and 21 may have influenced the occurrence of alcohol-related incidents and demand on SA Police.

Additional data points which could support the collation of more robust data and improved understanding of the drivers of alcohol-related crime, harm and disorder in the Park Lands may include:

- Basic demographic data of individuals, such as gender, age, housing status, housing location (e.g., postcode).
- The timing of incidents (whether the incident occurred between 8:00pm to 10:59am or between 11:00am to 7:59pm).
- Exact geographic location within the Park Lands i.e., Park 20.

THERE ARE MIXED VIEWS ABOUT THE EXTENT TO WHICH THE REGULATIONS HELP TO REDUCE ALCOHOL-RELATED CRIME AND HARM AND IMPROVE PUBLIC AMENITY

Reflecting prior rounds of consultation on this subject, stakeholders engaged as part of this research had mixed views as to whether the regulations have helped to reduce alcohol-related harm and improve public amenity in the Park Lands. It is important to note that stakeholders within the same organisation may have shared differing views on regulation effectiveness, making it inappropriate to generalise or ascribe views to particular stakeholder groups. Given the absence of quantitative data to demonstrate the efficacy or otherwise of the regulations, stakeholders' views are largely informed by their role and visibility of alcohol consumption in the Park Lands.

Some CoA stakeholders and traders identified examples of anecdotal evidence that the regulations have supported a reduction in alcohol-related issues in the Park Lands, including a decrease in property damage, vandalism, littering and anti-social behaviour, and making the Park Lands safer and more accessible for the community, traders and CoA staff.

> Ten years ago now… South Terrace [especially] the Veale Gardens (Park 20) area was shocking… everyday it was out of control… the violence, the damage… it was very intense. [People] tended to congregate in one spot, whereas these days it's way more spread out. – CoA stakeholder

However, other interviewees from CoA, SA Government, and ACCOs/community organisations had lower confidence that the regulations were influencing community behaviour, citing the continuation of excessive alcohol consumption in areas subject to both the 24/7 ban in Area 2 and

8pm-11am ban in Area 1. Among these stakeholders, it was highlighted that the regulations are an ineffective approach that has little to no impact on the decision-making and behaviour of people drinking in the Park Lands, particularly those at risk of homelessness.

> The regulations don't impact decision making or behaviours of the population [homeless] that we're working with. – ACCO/ Community organisation stakeholder

> [Dry area regulations] are probably not really working. They might be reducing some social and health issues, but I guess they're not actually working. – SA Government stakeholder

Most stakeholders interviewed agreed any increase in public amenity experienced in Parks 20 and 21 was likely due to the re-location of individuals consuming alcohol to other areas within the Park Lands or beyond the CBD as opposed to a reduction in alcohol consumption in Area 2. Some stakeholders expressed frustration and concern that the regulations are merely moving the 'problem' from one area of Adelaide to another. It was also noted that relocating people out of the CBD often moves them further away from support services. This is discussed further in Section 5.

> What we have found is we will see decreased incidence of emergency presentations around areas where there are dry zones. But we also know that it displaces people. It's not that people now don't drink... it's that those people are going elsewhere, so we're not really avoiding the harms necessarily to communities from having these regulations, if that makes sense. – SA Government stakeholder

> I think in one way we can look at [regulations] as a band-aid measure... it kind of covers up or displaces the problem. – SA Government stakeholder

As noted in Section 5, most stakeholders involved in the implementation of the regulations held the view that the regulations were one of many 'tools' available to support increased safety and reduced harm in the Park Lands. Stakeholders believed the ability of SA Police, including Operation Paragon, to decant alcohol and issue expiation notices was critical as it provided an opportunity for police to engage with individuals consuming alcohol in public without charging them with an offence. Some stakeholders interviewed believed the capacity for police to remove alcohol in circulation was important for supporting the health of individuals, as well as the broader outcome of increasing community comfort and safety. It was noted that the capacity of SA Police to decant alcohol at any time of the day in Parks 20 and 21 can result in earlier intervention with people in the Park Lands, potentially preventing a more escalated interaction later in the day (after 8:00PM) when a person may be very intoxicated and when community support services are not available for police to refer to.

Additionally, a small number of stakeholders consulted believed the regulations would be more effective in reducing alcohol-related crime and harm and improving public amenity were they better enforced by SA Police.

These stakeholders characterised 'better' enforcement as an increased police presence in the Park Lands, as well as an increase in expiation notices issued.

THERE WAS AGREEMENT AMONG STAKEHOLDERS THAT THE REGULATIONS ALONE ARE INSUFFICIENT TO REDUCE ALCOHOL-RELATED CRIME AND HARM IN THE PARK LANDS

As echoed in prior rounds of community consultation undertaken by CoA, there is almost universal consensus among stakeholders that alcohol-related crime and harm is likely to continue in the

Park Lands so long as systemic issues relating to alcohol and substance misuse, health, housing and employment remain unaddressed. While it was acknowledged that implementation of a holistic and coordinated approach to addressing the systemic drivers of alcohol misuse in the Park Lands is not within the remit of CoA alone, stakeholders interviewed emphasised the need to invest in a multi-faceted and collaborative approach to addressing the underlying drivers of alcohol-related crime and harm.

Respondents to the 2020 CoA Your SAy who disagreed with the introduction of 24-hour Dry Areas (84%, n=774) generally opposed them on the basis that Dry Areas were not addressing the root cause of alcohol abuse, instead criminalising what they believed was a health issue. A high proportion of respondents indicated they would like to see more funding for social support services instead of the ban. This sentiment was also demonstrated in the less extensive 2023 public consultation.

> Substance abuse issues need to be addressed, not pushed away to other areas. Council should work with other levels of government to implement long-term [policies] that support all members of our community, including those who drink too much. – CoA YourSAy survey respondent, 2023

There is evidence to indicate alcohol misuse is just one of many factors contributing to decreased public amenity and safety within the Park Lands. The compounding impacts of the housing crisis, rising cost of living, and increased accessibility of alcohol and other drugs are likely contributing to a rise in mental ill-health and further driving rates of public drinking. The lack of stable housing and financial pressures from the high cost of living increase stress and anxiety. Additionally, the increased availability and use of substances can lead to dependency and exacerbate existing mental health issues. These factors together result in more frequent and complex mental health and alcohol and other drug challenges, requiring comprehensive support systems to address. Poly-substance use was identified as a key issue for consideration by stakeholders interviewed. Several ACCO/community organisation stakeholders expressed concerns around the increasing use of methamphetamine and GHB among people in the Park Lands. One SA Police stakeholder noted that, as a depressant, individuals affected by GHB may present similarly to someone who is heavily intoxicated.

> Mental health is a huge problem [in Adelaide], as it is in every other city around Australia… people who are substance affected as well as alcohol affected [are] very vulnerable, but in a CBD environment it brings those people into interaction with much larger groups of people. There are various community groups and sporting groups using [the Park Lands], so if they're coming across people who are substance affected that are having mental health episodes… that is really going to affect their sense of safety and wellbeing. – SA Police stakeholder

5. IMPACT OF THE REGULATIONS

KEY FINDINGS

- **The ability to responsibly consume alcohol in the Park Lands is viewed as important for upholding the personal rights of local residents and visitors.** This ability was valued by the general public, with many considering 24/7 Dry Area regulations in all areas of the Park Lands to be an infringement on personal freedoms.
- **There is concern among some stakeholders that the regulations disproportionately impact marginalised communities**, with many describing how people experiencing homelessness and those from remote communities may be subject to discriminatory enforcement that displaces them from essential services, further complicating their access to specialist supports.
- **Most stakeholders agreed the removal of the regulations without substantive service reform could have a detrimental impact on the health of individuals and the experience of the broader community.** The role of the regulations to intervene and deescalate problematic drinking was emphasised and valued.
- **The regulations provide an increased sense of safety for some stakeholders, including traders, CoA workers and local residents**, who believed the regulations enhance safety for workers and users of the Park Lands by allowing police to manage alcohol consumption and mitigate behaviours that impact public perception of safety.

This section addresses the following evaluation questions:

- What is the impact (positive and negative) of the regulations on the target groups?
- To what extent do the regulations address and balance the perspectives of different groups?
- Are there any unintended consequences from the regulations?
- What would be the impact of removing the regulations for the different target groups?
- If the regulations are removed, what alternatives are there?
- Do the benefits of implementing the regulations outweigh the associated costs?

THE ABILITY TO RESPONSIBLY CONSUME ALCOHOL IN THE PARK LANDS IS VIEWED AS IMPORTANT FOR UPHOLDING THE PERSONAL RIGHTS AND FREEDOMS OF LOCAL RESIDENTS AND VISITORS

Documentation and data provided by CoA coupled with stakeholder interviews provide strong evidence to suggest the general public value the ability to consume alcohol in the Park Lands. Additionally, some stakeholders supported the right of marginalised communities to consume alcohol in the Park Lands, noting the historic and cultural relevance of the Park Lands as a cultural gathering place, and that public space is often the only space accessible to remote visitors and people experiencing homelessness.

In early 2020, CoA sought community feedback to understand levels of support for a 24/7 dry area across all areas of the Park Lands. Feedback was collected through an online survey (n=921) and an intercept survey (n=551).

Intercept survey respondents (the majority of whom were families using playgrounds in the southern Park Lands) were more likely to support the introduction of 24/7 dry areas in all of the

Park Lands. However, online survey respondents were far less supportive of 24-hour dry areas. The majority of online survey respondents 'strongly disagreed' (75%, n=686) or 'disagreed' (9%, n=86) with a 24/7 dry area across all areas of the Park Lands, indicating they used the Park Lands as a space to socialise, eat and drink with family and friends and viewed the imposition of a 24-hour dry area as an infringement on their personal rights and freedom. Notably, many online survey respondents who opposed 24/7 dry areas reported they were CoA residents.

> [In 2020] a blanket 24/7 ban [in the Park Lands] was discussed… as a result of a lot of different community views and feedback, the 8:00 PM to 11:00 AM ban [was maintained in most parts of the Park Lands which] … allows people having lunch time or early evening picnics… to be able to have a drink without breaching the [regulations]. – SA Police stakeholder

Additionally, several community organisation stakeholders interviewed described the importance in allowing members of marginalised communities, including remote visitors and people experiencing homelessness, some level of agency in how they use public space. Community organisation stakeholders interviewed described how many people who consume alcohol in the Park Lands do not have access to private property and may be excluded from licenced premises due to economic factors or because of discrimination.

> Having different regulation times probably allows for the expectations of community to be met. For people who are without housing to have a little bit of agency about how they spend their time, and what they do during the day – up until a point. – ACCO/Community organisation stakeholder

THERE IS CONCERN AMONG SOME STAKEHOLDERS THAT THE REGULATIONS DISPROPORTIONATELY IMPACT MARGINALISED COMMUNITIES

This evaluation identified a range of concerns relating to how regulations may be disproportionately impacting marginalised communities who frequent the Park Lands. However, this evaluation was unable to draw on substantive lived experience perspectives or quantitative data to understand the extent to which these communities are impacted. When describing groups most impacted by the regulations, stakeholders identified people experiencing homelessness and Aboriginal rural and remote visitors, specifically those visiting from Anangu Pitjantjatjara Yankunytjatjara (APY) Lands.

One of the primary concerns raised was that the regulations can displace vulnerable people who are seeking to avoid penalties. There was a belief among some stakeholders interviewed that this movement to other areas within the Park Lands and to areas outside of the Adelaide CBD may isolate vulnerable people from essential services and support networks (often more focused on the CBD), fragment communities, and complicate efforts by services to identify needs and provide support. Some stakeholders noted that regulations can also make it more challenging for community organisations to build rapport with people in the Park Lands, limiting the extent to which they can develop an understanding of individuals' needs and connect them with relevant services and supports.

> [The regulations] dislocate people from their support networks and their social circles. It dislocates people from their ability to seek care. – SA Government stakeholder

Additionally, there was concern the regulations have disproportionate impacts on those at risk of homelessness, given their lack of access to private spaces (i.e., housing) where they can consume

alcohol legally. This contributes to alcohol consumption occurring in the public spaces of the Park Lands. There was concern flagged by some community organisation stakeholders that the regulations mean marginalised communities are more likely to be in contact with a justice response for consuming alcohol than those who are able to do so in private spaces. It was also raised that the regulations may lead people to occupy less visible spaces, such as hidden or unsafe locations, to avoid penalties, which could risk their safety. One Aboriginal person interviewed described the act of moving around the Adelaide CBD to avoid enforcement of dry area regulations.

> [When dry area regulations were introduced in the CBD] people wouldn't meet in Victoria Square anymore. They'd go "we can't go there; we'll go to Light Square or Hindmarsh Square" … they'll go somewhere else. And then you know, [there would] be complaints from... other people in those areas saying, "now there's people here drinking and being loud and doing all this stuff". – Lived experience stakeholder

Several community organisation stakeholders and one lived experience stakeholder interviewed expressed concern that the regulations can be enforced inconsistently and in a matter which could potentially be discriminatory. It was suggested that under the regulations, SA Police officers have discretion to make subjective decisions, which may be influenced by conscious or unconscious biases. One community organisation stakeholder expressed concern that police attendance (tasking) throughout the Park Lands is often responsive to complaints (e.g., triple zero calls) about anti-social behaviour in the Park Lands. They described that members of the public and traders making complaints are likely to be influenced by conscious and unconscious biases, which could potentially lead to certain individuals or groups receiving more attention and potentially being penalised more harshly than others for similar behaviours.

> Perception is an issue. People might hear a lot of Pitjantjatjara speakers... people speaking in language [who are] intoxicated. All you hear is really loud speech... [this] can come across as aggression. Drunken blackfullas are mischaracterised as aggressive. – ACCO/Community organisation stakeholder

There is also concern among the wider community, including CoA residents, that Dry Area regulations cause harm to marginalised communities. Online survey responses from late 2023 showed five of the 30 YourSAy survey respondents believed the Dry Area restrictions were discriminatory and racist. However, the majority of respondents to a much larger (n=912) YourSAy community feedback survey in early 2020 reported Dry Area regulations disproportionately affect people experiencing homelessness as well as the Aboriginal and Torres Strait Islander communities who traditionally gather and socialise in the Park Lands.[4]

> The creation of the Dry Area regulations was… racist… all dry area constraints should be removed immediately. – YourSAy survey respondent, 2023

The potentially detrimental impact of the regulations on individuals who misuse substances was also noted by stakeholders from two drug and alcohol-focused organisations. They raised concerns the regulations may be detrimental to achieving better health outcomes for individuals struggling with alcohol and drug addiction. This feedback was consistent with what was reported to CoA in previous rounds of consultation. For example, the South Australian Network of Drug and Alcohol Services described in their written submission to Adelaide Park Lands Dry Area Regulation Consultation 2023 the potentially perverse outcomes of dry areas. These included the replacement of alcohol with illicit drugs, which may be easier to conceal in public spaces, as well as

[4] Analysis of survey responses was conducted internally by CoA staff.

an increase in drinking in private premises. South Australian Network of Drug and Alcohol Services suggested this has the potential to increase risks to already vulnerable members of the community and highlighted that consideration of alcohol consumption in the Park Lands through a health and harm minimisation lens would be of benefit to both Aboriginal and non-Aboriginal people alike. The prospective format of such supports is discussed further in Section 6.

MOST STAKEHOLDERS AGREED THE REMOVAL OF THE REGULATIONS WITHOUT SUBSTANTIVE SERVICE REFORM COULD HAVE A DETRIMENTAL IMPACT ON THE HEALTH OF INDIVIDUALS AND THE EXPERIENCE OF THE BROADER COMMUNITY

There was concern among many stakeholders that the removal of the regulations without substantive service reform could have various negative impacts. Broadly, there was agreement amongst various stakeholder groups (including SA Police, SA Government and traders) that removing the regulations would likely make it more difficult to manage alcohol-related incidents. Some CoA and ACCO/community organisation stakeholders suggested it could lead to an increase in incidents.

> [Removing the regulations] … is dangerous… it would send a message that [public intoxication] is acceptable behaviour. – SA Government stakeholder

In particular, the potential negative impacts on marginalised communities that use the Park Lands were raised. As discussed in Section 3, many stakeholders highlighted the importance of the regulations as a legal means through which SA Police can intervene and deescalate problematic drinking before it reaches crisis point. Some stakeholders (SA Government) believed that if the regulations were removed, this would likely lead to more emergency department presentations or Public Intoxication Act apprehensions, as there would be no ability to actively intervene and deescalate problematic drinking before it reaches crisis point and prompts these responses. This was highlighted as particularly problematic in the context of Closing the Gap and the Royal Commission into Aboriginal Deaths in Custody, which called out the overrepresentation of Aboriginal people in custody and of Aboriginal deaths in custody, and the need to reduce the numbers of Aboriginal people held in custody (Closing the Gap, n.d.; Office of the Aboriginal and Torres Strait Islander Social Justice Commissioner, n.d.).

Additionally, some stakeholders expressed concern that removing the regulations could have negative impacts on community safety and the overall appeal of the Park Lands as a public space. Concern for community safety was reflected in the 2023 Dry Area consultation, where organisations that are first responders to anti-social behaviour, safety incidents and emergency responses were generally supportive of continuation of the regulations (City of Adelaide, 2023a).

For example, SA Police cited concern in their submission that the removal of the regulations would have a detrimental impact on community safety (City of Adelaide, 2023a). Concern for the overall appeal of the Park Lands was raised by CoA stakeholders consulted for the evaluation, who felt strongly that without the regulations there would be an increase in littering and vandalism. It was suggested this would lead to a higher workload for staff, increased costs for CoA and potentially a decline in the cleanliness of the Park Lands.

Despite mixed views regarding the effectiveness of the regulations (see Section 4) these findings reflect a general reluctance to remove the regulations due to concerns about potential negative impacts. The need for a strengthened service system to mitigate these negative impacts is further discussed in Section 6.

> I would very strongly not be in favour of just stopping the regulations... I think that's going to cause a lot of harm for people as well. – SA Government stakeholder

THE REGULATIONS PROVIDE AN INCREASED SENSE OF SAFETY FOR SOME STAKEHOLDERS, INCLUDING TRADERS, COA WORKERS, AND LOCAL RESIDENTS

Notwithstanding varying perspectives on the effectiveness of the regulations, there was a firm belief among several stakeholders interviewed, including those representing SA Police, CoA and traders, that the regulations promote a sense of safety among people who work in and use the Park Lands. This sentiment was also reflected in community consultation undertaken by CoA in 2020 and 2023 via the YourSAy survey.

CoA stakeholders interviewed who work in the Park Lands described feeling considerably safer while working because of the regulations. They felt reassured in knowing they could contact police when they observed people consuming alcohol, and were confident the regulations send an important message to the wider community that alcohol consumption is not tolerated and can result in police enforcement. Similarly, local traders reported feeling reassured they could contact police if they observed people drinking alcohol during the hours/in the areas where it is restricted.

> For me, as a worker, [24-hour dry area regulations throughout the Park Lands] would make me feel a lot safer every day and I know the residents probably feel the same way. – CoA stakeholder

The regulations are considered by SA Police as being an important tool in supporting police efforts to manage community expectations and enhance overall safety and wellbeing, helping to balance the complex interplay between maintaining public order and supporting vulnerable individuals such as those affected by substance abuse or mental health issues. One SA Police stakeholder interviewed identified a key benefit of the regulations is providing officers with the ability to mitigate behaviours that, while not always criminal, significantly impact community members' sense of safety. Interactions with individuals who are heavily alcohol-affected and who may also be experiencing mental health episodes have the potential to be distressing for the general public, including community and sporting groups who use the Park Lands. These interactions, although not necessarily resulting in crime statistics, can lead to a perception of a lack of safety and vulnerability. The regulations can support SA Police, particularly the Paragon Unit, to proactively manage behaviours that could be perceived as threatening by the wider community. One SA Police stakeholder reported the regulations help to prevent the escalation of negative perceptions about certain areas, reducing the chances of media stories or word-of-mouth reports that could lead to area being labelled 'unsafe'. This supports the wellbeing of the community by fostering a sense of security and encouraging the use of public spaces.

> If there is someone who's heavily alcohol affected, who is being very loud and abusive and disruptive when a sporting group are trying to use an area of the Park Lands… people who have… been relatively sheltered or if they've not come across that kind of confronting behaviour before, they're going to be greatly affected by the interaction. That interaction is not going to generate a crime statistic, but it's going to affect their feeling of safety in that area. – SA Police stakeholder

Approximately one third (n=12) of CoA residents who responded to the 2023 YourSAy survey believed the Dry Areas regulations were important for maintaining public safety and amenity. Fifteen per cent (n=138) of respondents to the 2020 YourSAy survey indicated strong support for 24-hour Dry Area regulations throughout all the Adelaide Park Lands, with key reasons for support including:

- Making the Park Lands, in particular playgrounds, more family friendly.
- Reducing harassment and intimidation of Park Lands users by people who are intoxicated.

- Making the Park Lands safer and more accessible; and
- Reducing littering and the burden on Park Land staff to clean up after intoxicated people.[5]

> Since the implementation of the dry area zone Veale Gardens has been a delight to visit. Less rubbish, no fights and anti-social behaviour. There have been nearly no call outs for police and or ambulance by local residents. Families have returned for picnics and enjoyment of this wonderful open space. – YourSAy survey respondent, 2023

[5] The proportion of survey respondents who were local residents or residents of CoA could not be determined using the data provided.

6. SERVICE LANDSCAPE

KEY FINDINGS

- **There are a range of specialist services to support people experiencing problems with alcohol and drug use in the City of Adelaide local government area.** Over 20 services were identified providing a range of health, alcohol and other drug, housing, sobering up support and Aboriginal specific care.
- **Aboriginal rural and remote visitors to the Park Lands face particular challenges in accessing appropriate support.** Rural and remote visitors are disproportionately impacted by the regulations. They have a range of support needs, but face barriers in accessing services, including a lack of services targeted to this group that are in language and culturally safe.
- **Resourcing for services is insufficient to meet demand in response to the Park Lands Dry Areas.** Insufficient resourcing of services limits the capacity of services to respond after hours and to undertake assertive outreach. This means the service response after hours tends to be less person centred, trauma informed, and culturally safe.
- **A stronger service response is required to better support those impacted by the regulations regardless of whether the regulations are removed.** The regulations themselves are not sufficient to address alcohol-related crime and harm in the Park Lands given its complex and entrenched drivers and should be supported by a more intensive, multiagency service response with culturally appropriate preventative measures and holistic wrap-around support.
- **Future approaches should provide culturally safe, wrap-around support to meet the needs of those impacted by the regulations.** Additionally, a strengthened service response would involve better access to alcohol and other drug services and supports, housing and safe spaces, and services that operate after hours.

This section addresses the following evaluation questions:

- What is the current service and support landscape for people experiencing problems with alcohol or drug use in Adelaide?
- What additional services and supports would need to be established/expanded if the regulations were removed?

THERE ARE A RANGE OF SPECIALIST SERVICES TO SUPPORT PEOPLE EXPERIENCING PROBLEMS WITH ALCOHOL AND DRUG USE IN ADELAIDE

There are a range of specialist services to support people experiencing problems with alcohol and drug use in Adelaide. Urbis undertook a service mapping exercise to understand the current service provision landscape relevant to groups who use the Park Lands and are most impacted by the regulations.

This service mapping identified over 20 services and supports, broadly targeted to Aboriginal people (including remote visitors), people experiencing homelessness and poverty (including young people and people sleeping rough) and people requiring support for alcohol and other drug use. Commonly, services include provision of a safe place to sober up or drop in, or supportive accommodation (e.g., transitional, rehabilitation); health services; advocacy, referral and case

management; culturally safe services; and provision of basic needs (such as clothing and food). The results of the service mapping are presented in Appendix A.

To augment the service mapping, stakeholders interviewed were asked to describe the service landscape in response to the regulations. Stakeholders consistently identified the MAP bus, Safer Place to Gather, the Salvation Army Sobering Up Unit, and the Green Team volunteer patrol as the key services available to support people who drink alcohol in the Park Lands, suggesting greater awareness and likely high demand for these services. Operation Paragon was also frequently described as enabling a service response for this cohort. The capacity of services to meet demand is discussed below.

ABORIGINAL RURAL AND REMOTE VISITORS TO THE PARK LANDS FACE PARTICULAR CHALLENGES IN ACCESSING APPROPRIATE SUPPORT

Aboriginal people visiting from rural and remote areas, such as the APY lands and remote Northern Territory, are one of the core groups who use the Park Lands. Many stakeholders expressed concern they are disproportionately impacted by the regulations. As described above in Section 1.1, usage of the Park Lands by this group is driven by a variety of factors, including but not limited to the need to access health services in Adelaide, seasonal weather patterns, remote area alcohol restrictions, social participation and cultural and family responsibilities.

> Let's say I've been brought down (to Adelaide from a remote area) by the Royal Flying Doctor. But then eventually, the rest of the family will come down… and once they get here, they really have no resources to go back home… And they don't have the capacity to be staying at the Comfort Inn or on North Terrace, for example, across the road from the Royal Adelaide. So they might stay in… hang around in the park lands. – ACCO/community organisation stakeholder

Consultation with community organisations and ACCOs highlighted the unique support and service needs for this group including safe accommodation, resources to be able to return to Country, and culturally safe service delivery. However, these stakeholders reported that rural and remote visitors often face challenges in accessing needed services. Among the 23 services identified in the service mapping, just ten were identified as specifically providing culturally safe services. Seven were targeted specifically to rural and remote visitors, however only two were identified as providing services in language. This suggests there are insufficient services with the capacity to meet the needs of this group.

Safer Place to Gather was established in 2023 in response to this unmet need. It followed the previously implemented Puti on Kaurna Yerta, an outreach and case management service hub, which ran from October to December 2021 (Valente et al., 2022). Safer Place to Gather provides vulnerable remote Aboriginal visitors who are sleeping rough and impacted by alcohol use and health conditions a safe place to shelter, socialise and access culturally appropriate support (City of Adelaide, 2023a). There is some evidence of the effectiveness of Safer Place to Gather. DHS' submission to the 2023 consultation reported that since commencement, it has been well utilised by rural and remote visitors and has received positive feedback from agencies involved regarding its impact in reducing high risk behaviour and alcohol-related harm in the city (City of Adelaide, 2023a).

However, some CoA stakeholders interviewed recognised Safer Place to Gather has faced some challenges in its implementation including conflict between different groups utilising the service. It is also worth noting that Safer Place to Gather is managed by DHS (DHS, 2023), in contrast to Puti on Kaurna Yerta which was culturally led (Valente et al., 2022). This was highlighted by CoA staff as a potential barrier to effective service delivery. Additionally, one ACCO/community services

stakeholder noted there are few public amenities including drinking water and toilets in this part of the Park Lands. No evaluation has been undertaken to date to assess the effectiveness and impact of Safer Place to Gather. Additionally, the initiative is intended to be a time limited response (City of Adelaide, n.d.-c), and as yet there are no similar services that could fill this gap (for a culturally safe service hub located in the CoA local government area).

RESOURCING FOR SERVICES IS INSUFFICIENT TO MEET DEMAND IN RESPONSE TO THE PARK LANDS DRY AREAS

Despite the range of services described above, their resourcing is insufficient to meet community needs and demand in the Park Land Dry Areas. Generally, stakeholders interviewed highlighted a reliance on under resourced services that regularly face high demand and complex client needs. Demand was noted to be particularly high during summer months due to a greater number of remote visitors to the Park Lands, in addition to other groups that utilise the Park Lands during summer. Some stakeholders, including SA Government and ACCOs/community organisations, reported instances of services (e.g., the MAP bus) being at capacity and having to turn people away. Under resourcing of services was highlighted in the 2014 and 2020 Dry Area consultations, where community members and organisations indicated constrained service capacity and the need for more funding for services (Adelaide City Council on 24/06/2014 City Wide Dry Area Review, 2014; City of Adelaide, 2020).

Many stakeholders, including ACCOs/community organisations, CoA and SA Police, reported that services are limited in their capacity to respond to alcohol-related behaviours in the Park Lands because they are often not operational overnight or on weekends. Constrained resourcing was highlighted as a key contributing factor to limited service hours. A commonly cited example was Paragon which does not operate after hours. The MAP bus hours were also commonly raised by stakeholders, however it should be noted that the service has recently increased its operating hours to run until 1:45am seven days per week, until the end of March 2025. The Green Team volunteer patrol, run by Encounter Youth, was identified anecdotally by one CoA stakeholder as the “only ones” doing harm minimisation after hours. Although there are services that do operate overnight and/or on weekends (for example the Salvation Army Sobering Up Unit, open 24/7), availability and capacity to respond after hours was considered largely limited across the service landscape, particularly amongst services providing an outreach or transportation service. Of the 23 services identified in Urbis’ service mapping exercise, just five are listed as operating after hours.

Some stakeholders from SA Government and ACCOs/community organisations emphasised that this gap means service responses after hours tend to be less person centred, trauma informed, and culturally safe.

This is because the ability to link people to services is restricted and the available policing response is not driven to the same extent by the highly relational approach considered a key enabler of Paragon (see Section 3). The impact of constrained resourcing on service hours was noted as particularly significant by a range of stakeholders because much alcohol consumption and related harm happens outside typical service hours, regardless of the timing of the Dry Areas (i.e., the 8pm-11am time ban).

> Policing during daytime operational hours is always going to be a little bit different. During the day, police can access and direct people to different services. [They] could direct someone to the MAP bus, you can encourage them to access Safer Place to Gather, returning to tenancies… potentially taking them to the sobering up unit or getting outreach out to help. At nighttime… when the MAP bus is no longer operating, when outreach is no longer operating, I think the policing response [is very] different. – SA Government stakeholder

A STRONGER SERVICE RESPONSE IS REQUIRED TO BETTER SUPPORT THOSE IMPACTED BY THE REGULATIONS REGARDLESS OF WHETHER THE REGULATIONS ARE REMOVED

A stronger service response is needed to support people with drug and alcohol use in the Park Lands, regardless of any changes to the regulations. It was acknowledged by the majority of stakeholders that the regulations themselves are not sufficient to address alcohol-related crime and harm in the Park Lands given its complex and entrenched drivers. Despite mixed views regarding the appropriateness of the regulations, the need for a stronger service response, involving increased funding and more services, was emphasised.

This was a view validated by previous consultations. The 2020 Dry Area consultation found a key theme expressed by a range of stakeholders was that the regulations were not adequate to resolve the issues experienced in the Park Lands and that they should not exist in isolation (City of Adelaide, 2020). Stakeholders who provided feedback in the 2023 Dry Area consultation similarly expressed that the regulations are not themselves a solution and additional long-term strategies to address complex social needs are required (City of Adelaide, 2023a).

FUTURE APPROACHES SHOULD PROVIDE CULTURALLY SAFE, WRAP-AROUND SUPPORT TO MEET THE NEEDS OF THOSE IMPACTED BY THE REGULATIONS

There are specific approaches that are needed to provide a stronger service response in addressing alcohol-related behaviour and harm in the Park Lands. These are described below.

Culturally safe services

Cultural safety was highlighted by many stakeholders including CoA, SA Police and ACCOs/community organisations, as a crucial element in strengthening the service response. This was highlighted given these stakeholders felt the regulations disproportionately impact Aboriginal community members and remote visitors. As noted above, service mapping suggests there are few such services available; out of the 23 services identified, ten were identified as providing culturally safe services and two as providing services in language.

Some SA Police and CoA stakeholders interviewed referenced Puti on Kaurna Yerta as evidence of the potential benefits to be gained from a culturally safe service. The evaluation of Puti on Kaurna Yerta reflects this.

It found positive outcomes in service engagement and decreased assault and disorderly conduct offences and attributed its successes largely to its focus on cultural leadership and the centring of culturally safe delivery throughout (Valente et al., 2022).

Although community stakeholders were not included in Puti on Kaurna Yerta's evaluation, the need for culturally safe services was commonly identified by a range of stakeholders, including community, in previous Dry Area consultations (City of Adelaide, 2020, 2023b). ACCO and community organisation stakeholders interviewed reported the value in having cultural safety embedded as business as usual in any service response addressing alcohol-related behaviour and harm in the Park Lands. In particular, they emphasised the value of cultural safety being embedded in policing responses from a lived experience perspective.

Wrap-around, coordinated services and assertive outreach

The need for a service response that provides wrap-around, holistic support was also emphasised in lived experience, SA Health and ACCO/community organisation consultations, in the context of the intersecting health and social needs that contribute to alcohol-related behaviours and harm. Many services identified in service mapping (16 services) provide some form of referral, care coordination or support to access services, though the extent to which support is wrap-around (i.e., coordinated and integrated) is varied. Service hours and referral criteria limit the accessibility of these services.

The value of a multi-agency coordinated response to provide wrap-around support was highlighted by a range of stakeholders interviewed, as well as in previous consultation. DHS' 2023 submission described the positive impacts achieved through a range of multi-agency coordinated responses in recent years in addition to Safer Place to Gather, including multi-agency assertive outreach teams to coordinate supports (DHS, 2023). South Australia's Closing the Gap plan indicates that in 2024 the assertive outreach teams were still operational (Government of South Australia, 2024) however ongoing commitment is unclear.

Similarly, Puti on Kaurna Yerta was identified by CoA and SA Police stakeholders as an example of an effective response that provided wrap-around support. The Puti on Kaurna Yerta evaluation found its coordinated, multi-agency approach to service provision helped to address the needs of clients holistically (Valente et al., 2022). A few SA Government stakeholders additionally emphasised the potential benefits of a co-located service hub in mitigating barriers to access for this group, suggesting that it is easier for people to attend services when they are located centrally.

Alcohol and other drug support

Also commonly raised in consultations was the demand for alcohol and other drug services. This included that additional harm reduction facilities be made available in the Park Lands, such as syringe disposal and more drinking water. A few stakeholders including CoA, lived experience and ACCO/community organisations emphasised the use of drugs in the Park Lands as a problem that often intersects with harmful alcohol use, and the lack of accessible harm reduction measures (such as syringe disposal, access to affordable meals and drinking water). DASSA's needle and syringe program has numerous facilities in the CoA and surrounding suburbs that provide sterile needles and syringes, sharps disposal containers and disposal facilities, information, education and referral for people who inject drugs (SA Health, 2024). No facilities are located in the Park Lands themselves, except for sharps disposal located in public toilets (SA Health, 2024).

Additionally, ACCO/community organisation and SA Government stakeholders suggested more managed alcohol programs and detox services are needed. Service mapping identified six culturally safe alcohol and other drug services.

From the information available, it was not evident that identified services provide any managed alcohol programs, although Safer Place to Gather allows supervised alcohol consumption in select hours.

The Supervised Alcohol Provision Program (SAPP), a managed alcohol program targeted toward Aboriginal people with alcohol use and piloted for 12 months in 2023 by Drug and Alcohol Services South Australia (DASSA), was identified as a successful model by SA Government stakeholders. SAPP's evaluation found that participants valued a safe space to reduce their alcohol intake at a self-determined pace. Broadly, participants reported positive experiences of the program and that they were motivated to return if it were continued (Bertossa et al., 2024). This indicates demand for such a program.

Housing and safe spaces

As described above in Section 1, lack of access to housing is a key driver contributing to alcohol-related behaviours and harm in the Park Lands. Some stakeholders, including lived experience and ACCOs/community organisations, emphasised this, noting that for people without housing the Park Lands are living and gathering spaces where alcohol is invariably consumed. Some ACCO/community organisation stakeholders identified that a lack of housing or accommodation and/or supports to access housing/ accommodation means that even though people may be able to access other services, they are likely to cycle back into homelessness and alcohol use. This gap is demonstrated by the service mapping which found just six of 23 services provide housing and homelessness support, and of these, two that provide culturally safe accommodation.

Housing was highlighted as a primary need that precedes the ability to address alcohol and other drug use or other needs. The need for housing and safe spaces is further evidenced in the SAPP evaluation. SAPP participants typically included remote Aboriginal visitors from South Australia and the Northern Territory who frequent social drinking circles and camps established in the Park Lands. Interviews with SAPP participants described access to a safe space as a key attracter to the program, allowing a break from being in the Park Lands or houses where Aboriginal people were congregating to drink. Participants frequently noted they felt these spaces to be unsafe and increased exposure to alcohol and other drugs (Bertossa et al., 2024).

Services to fill all hours

As described above, the reduced service availability after hours and on weekends was identified by stakeholders to be a significant barrier in responding to alcohol-related behaviours and harm in the Park Lands. This was also reflected in the service mapping which found just four services operate after hours. The need for services that operate after hours is again highlighted.

7. CONCLUSIONS AND RECOMMENDATIONS

7.1. CONCLUSION

The regulations were introduced as a trial in 2014 to address alcohol-related harm and improve public amenity in the Park Lands. Since this time, the regulations have been extended on multiple occasions, although their effectiveness and impact on different groups are not well understood. Multiple reviews conducted by the CoA have highlighted the polarity of views among stakeholders, as well as gaps in quantitative evidence available to support informed decision-making on the regulations.

Based on available evidence analysed for this evaluation, the regulations have been well implemented with well-defined roles and responsibilities for awareness raising, enforcement, encouraging compliance and decision making. Most stakeholders consulted reported the regulations are an important tool which enable SA Police to intervene and de-escalate anti-social behaviour early, thereby preventing a justice response. SA Police rarely issue fines to those in breach of the regulations, instead using their discretion to tip out alcohol containers and issue warnings. Stakeholders praised the efforts of SA Police, and Operation Paragon in particular, in working collaboratively with relevant agencies to support positive outcomes for potentially vulnerable community members.

While most stakeholders supported an extension of the regulations, the inconsistent time spans of the Dry Areas were a point of contention. The rationale for the 24/7 ban in Parks 20 and 21 is not well understood, suggesting a need for greater transparency in decision making.

Current data collection mechanisms are inadequate to measure the effectiveness of the regulations in achieving the intended objectives. Some stakeholders felt the regulations helped to reduce crime and improve amenity while others felt the regulations made no difference, citing frequent breaches of the regulations and examples of vandalism, assault and harassment by people consuming alcohol in the Park Lands. CoA staff, local traders and local residents reported the regulations foster a sense of safety for workers and visitors in the Park Lands. They highlighted the regulations send a clear message that excessive alcohol consumption is not tolerated, and felt reassured knowing they could report breaches to polices when necessary. Despite these mixed views, there was strong agreement that the regulations alone do not adequately address the underlying drivers of alcohol-related harm.

A range of services and supports operate in Adelaide to support people with alcohol and other drug issues and who may be impacted by the regulations. However, resourcing and access to these services is insufficient to meet demand and there is a need for more culturally safe, wrap-around support, particularly for rural and remote visitors to Adelaide. The current situation is the result of entrenched social issues, and a significant, system-level response is needed before the regulations can be lifted.

7.2. RECOMMENDATIONS

Based on evaluation findings, there are nine recommended actions to strengthen the response to alcohol-related incidents in the Park Lands. The table overleaf sets out the recommended actions across four themes, the rationale for each action, lead organisation and potential partners, and proposed timing for implementation.

The themes are:

- Regulation continuation.
- Strengthen regulation implementation.
- Decision-making informed by robust data and evaluation.
- Early intervention strategies to address the underlying drivers of alcohol consumption and to support better outcomes.

The recommended actions acknowledge the complex drivers of problematic alcohol consumption in the Park Lands and the need for a multiagency, partnership approach to implement meaningful change. The actions have been developed as a suite of complementary and reinforcing strategies, with a strong rationale for implementing all recommendations concurrently.

Table 5 – Recommended actions

Recommended actions	Rationale	Roles and responsibilities	Timing
Regulation continuation			
1. Extend the current regulations for a further three years.	The regulations are generally supported as a useful tool for intervening to reduce alcohol-related harm and to promote public safety. Extending the regulations for a further three years will provide sufficient time for the development and implementation of a robust Data Strategy (see recommended action 6). Any decision to extend the regulations beyond this should be based on a thorough evaluation (see recommended action 7).	**Lead:** Minister for Small and Family Business, Consumer and Business Affairs, and Arts/Consumer and Business Services	2025-2026
2. Assess lifting the 24/7 ban in Area 2 (Parks 20 and 21) to be consistent with the restrictions in Area 1, once the necessary data collection processes are in place (see recommendation 6 below).	A number of stakeholders including local residents have questioned the rationale of the 24/7 ban in Area 2. Any changes to the regulations should be supported by robust data collection arrangements to ensure effective tracking of the impact and efficacy of the change and to provide an evidence base to inform decision making.	**Lead:** Minister for Small and Family Business, Consumer and Business Affairs, and Arts/Consumer and Business Services	After data collection process established by SA Government and operational
Strengthen implementation regulation			
3. Develop and implement clear guidelines and protocols for the enforcement of the	Responses by SA Police to alcohol-related incidents in the Park Lands may vary	**Lead:** Minister for Police	2025-2026

Recommended actions	Rationale	Roles and responsibilities	Timing
regulations to ensure consistency and minimise biases.	depending upon the officer attending, time of day, location and situation. A standardised protocol is important to ensure consistent implementation of the regulations regardless of the time of day or week and will also assist to manage stakeholder expectations.	**Partners:** SA Police, Safety and Wellbeing Taskforce	
4. Expand resources for Operation Paragon, the dedicated SA Police unit focused on addressing alcohol-related anti-social behaviour through a multi-agency approach, to increase the number of trained officers and to broaden the operational hours of this unit.	There is broad consensus that the relational and harm reduction focus of Operation Paragon delivers positive outcomes for those consuming alcohol in the Park Lands and to the broader community. Resource constraints limit Operation Paragon's ability to attend the Park Lands during weeknights and over the weekends. While all SA Police is responsible for enforcement of the regulations, this recommendation aims to enhance the capacity of Operation Paragon specifically, acknowledging its unique role and approach.	**Lead:** SA Police **Partners:** ACCOs and community organisations	2025-2026
5. Implement a co-design approach to develop a public awareness strategy about the regulations and services available.	Awareness of the regulations is believed to be mixed among people accessing the Park Lands, including young people and rural and remote visitors, particularly those new to Adelaide. A refreshed awareness strategy should include additional or updated signage throughout the Park Lands that indicates the time spans of Dry Areas. The strategy should also consider use of Aboriginal language and	**Lead:** Consumer and Business Services **Partners:** ACCOs, CoA and community organisations	2025-2026

Recommended actions	Rationale	Roles and responsibilities	Timing
	include promotion of specialist services (e.g., youth services, Aboriginal-led services).		
Decision-making informed by robust data and evaluation			
6. Develop a Data Strategy to enhance data collection arrangements and to effectively track the impact of the regulations and other complementary strategies over time. This should be underpinned by a Memorandum of Understanding between relevant parties.	The current understanding of the regulations' effectiveness is limited due to a lack of comprehensive data collection over the past ten years. While qualitative data has provided valuable insights, there is a need for more quantitative data to fully assess the efficacy of the regulations and to inform decision-making about the effectiveness of other supporting strategies. Qualitative and quantitative data are crucial for triangulating findings and developing a holistic understanding of the regulations' effectiveness and impact. A robust Data Strategy will need to articulate purpose, scope and underlying research questions aligned to intended outcomes for different stakeholder groups to inform data collection arrangements and roles and responsibilities, including governance and formalised data sharing arrangements between partner agencies. Future data collection of alcohol-related incidents in the Park Lands should consider the inclusion of basic demographic data of individuals, the time/date of incidents and exact geographic	**Lead:** Department of Human Services (DHS) **Partners:** SA Police, South Australian Ambulance Service (SAAS), Safety and Wellbeing Taskforce, CoA, community organisations and ACCOs	2025-2026

Recommended actions	Rationale	Roles and responsibilities	Timing
	location. The Data Strategy should align with the broader Evaluation Framework.		
7. Conduct an evaluation of the implementation and effectiveness of the regulations and supporting strategies, commencing at least one year before expiration.	The regulations must be reviewed with due consideration of broader contextual factors and the range of supporting strategies in place. Future evaluations should be informed by improved data collection arrangements and a longer timeline to enable the conduct of stakeholder consultations including those with lived experience of the regulations. Future evaluations may also consider an assessment of the economic costs and benefits of the regulations in conjunction with a range of supporting strategies.	**Lead:** DHS **Partners:** Safety and Wellbeing Taskforce	At least one year before expiration 2026-2027
Early intervention strategies to address the underlying drivers of alcohol consumption and to support better outcomes			
8. In close collaboration with community organisations and ACCOs, further investigate the design and delivery of tailored and intensive wrap-around support services to better support people who access the Park Lands experiencing challenges related to alcohol and other drugs, homelessness and chronic health and wellbeing issues. This should include:	While there are a range of alcohol and other drug, housing and health support services operating in Adelaide, they are currently under resourced to meet the needs of complex and chronic challenges of people who access the Park Lands. In particular, there is currently a lack of assertive outreach services and culturally safe and appropriate services in language.	**Lead:** DHS **Partners:** Community organisations and ACCOs	Commencing 2025-2026

Recommended actions	Rationale	Roles and responsibilities	Timing
▪ assertive outreach services to connect people to relevant supports and provide ongoing case management ▪ support after hours and on weekends ▪ culturally appropriate and safe services for Aboriginal rural and remote visitors including appropriate in-language services			
9. Co-design, with Kaurna Elders and local community, a culturally safe gathering place for Aboriginal people including Aboriginal people from rural and remote areas. The gathering place should provide facilities for visitors and facilitate connections with specialist services (see recommendation 8). The place should be run and managed by Aboriginal organisations in ongoing partnership with the Kaurna community.	There is currently no designated culturally safe place for Aboriginal rural and remote visitors to gather in the CoA local government area. The evaluation of the Puti on Kaurna Yerta, supported by stakeholder consultations, provides evidence of the benefit of an Aboriginal-run gathering space where cultural connection can be fostered and remote visitors can access a range of alcohol and other drug services, housing and specialist supports. There is an opportunity to learn from this model and further promote connection to culture, Country and community which are well-established protective factors for Aboriginal communities.	**Lead:** Safety and Wellbeing Taskforce **Partners:** DHS, CoA, Drug and Alcohol Services South Australia (DASSA)	Commencing 2025-2026

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This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

APPENDIX A SERVICE MAPPING

Organisation	Service name	Referral	Operational hours	Geographic area	Target client group/s	Services provided	Service type
Royal Adelaide Hospital	Rural Liaison Nurse	Eligibility criteria	Business hours	City of Adelaide	Rural/ remote Aboriginal visitors	▪ Transport ▪ Community based follow up	Health and transport service
Aboriginal Sobriety Group	Substance Misuse Team	Requires referral	Business hours	City of Adelaide	Aboriginal people who use alcohol and other drugs	▪ Referral, care coordination, or support to access services ▪ Assessment of needs Counselling Advocacy Rehabilitation	Alcohol and other drug services
Aboriginal Sobriety Group	Cyril Lindsay House and Annie Koolmatrie House	Info not available	Info not available	Suburbs further from Park Lands	Aboriginal people experiencing homelessness	▪ Access to housing/ accommodation	Housing and homelessness
Aboriginal Sobriety Group	Western Adelaide Aboriginal Specific Homelessness Service	Info not available	Business hours	Suburbs further from Park Lands	Aboriginal people experiencing homelessness	▪ Culturally safe service ▪ Referral, care coordination, or support to access services ▪ Access to housing/accommodation ▪ Engagement and guidance from Aboriginal elder and community	Housing and homelessness

Organisation	Service name	Referral	Operational hours	Geographic area	Target client group/s	Services provided	Service type
Aboriginal Society Group	Mobile Assistance Patrol (MAP)	No referral needed	After hours (last service at 1:45am), 7 days per week until end March 2025. Generally last service 12am.	City of Adelaide	▪ Intoxicated people ▪ Aboriginal people ▪ Rural/ remote Aboriginal visitors	▪ Transport ▪ Safe place to sober up ▪ Culturally safe service	Transport and sobering up service
Anglicare	The Magdalene Centre	Dependent on service	Business hours	City of Adelaide	▪ People experiencing poverty	▪ Housing and homelessness support ▪ Legal aid ▪ Counselling ▪ Provision of essential amenities	Anti-poverty services
DASSA	Aboriginal Connection Program	Requires referral, client must meet criteria to be considered	Business hours	Suburb in close proximity to Park Lands	▪ Aboriginal people who use alcohol and other drugs ▪ Aboriginal people experiencing homelessness	▪ Assessment of needs ▪ Outreach ▪ Referral, care coordination, or support to access services	Alcohol and other drug services
DASSA	Needle and syringe program	No referral	Dependent on service	City of Adelaide Suburbs - No facilities in Park Lands themselves	▪ People with substance use	▪ Harm reduction facilities ▪ Referral, care coordination, or support to access services ▪ Provision of information	Alcohol and other drug services

Organisation	Service name	Referral	Operational hours	Geographic area	Target client group/s	Services provided	Service type
DHS	Exceptional Needs Unit, Homelessness Support Program	Referral required from organisations and service only	Business hours	Suburb in close proximity to Park Lands	▪ People with complex needs	▪ Assessment of needs	Assessment and advice
Encounter Youth	Hindley Street Green Team Program	No referral needed	After hours	City of Adelaide	▪ Intoxicated people	▪ Street patrol ▪ Referral, care coordination, or support to access services ▪ Safe interaction	Street patrol
Hutt St Centre	Hutt St Centre	Intake and assessment for some services	Business hours	City of Adelaide	▪ People experiencing homelessness	▪ Legal aid ▪ Provision of basic needs or amenities ▪ Referral, care coordination, or support to access services ▪ Peer support ▪ Crisis assistance ▪ Connection to education and employment opportunities	Housing and homelessness
Mission Australia	Partners Toward Wellbeing	Requires referral	Business hours	Suburb in close proximity to Park Lands	▪ People with mental health concerns ▪ People who use alcohol and other drugs	▪ Counselling ▪ Referral, care coordination, or support to access services ▪ Culturally safe service ▪ Peer support	Alcohol and other drug services

Organisation	Service name	Referral	Operational hours	Geographic area	Target client group/s	Services provided	Service type
Multicultural Youth Education & Development Centre	The City West Hub	No referral needed	After hours	City of Adelaide	▪ Young people	▪ Safe space ▪ Assessment of needs ▪ Transport	After-hours crisis service
Nunkuwarrin Yunti	Health and wellbeing services (variety of services)	Dependent on service	Business hours	City of Adelaide Suburbs	▪ Aboriginal people	▪ Health services ▪ Alcohol and other drug services ▪ Referral, care coordination, or support to access services ▪ Counselling ▪ Provision of essential amenities ▪ Culturally safe service	Health service
Royal Adelaide Hospital	Aboriginal & Torres Strait Islander Health and Wellbeing Hub (Hub)	No referral needed	Business hours	City of Adelaide	Rural/remote Aboriginal visitors Aboriginal people	▪ Culturally appropriate service ▪ Referral, care coordination, or support to access services ▪ Advocacy ▪ Provision of amenities ▪ Aboriginal language interpreters/ service specifically for Aboriginal language speakers	Health and referral service
Royal Adelaide Hospital	Patient assistance transport scheme	Eligibility criteria	Info not available	City of Adelaide	Rural/remote Aboriginal visitors	▪ Transport	Transport

Organisation	Service name	Referral	Operational hours	Geographic area	Target client group/s	Services provided	Service type
SA Housing Trust	Wali Wiru (Good Homes) Program	Requires referral	Info not available	Metro	Rural/remote Aboriginal visitors	▪ Access to housing/accom-modation ▪ Culturally safe service ▪ Aboriginal language interpreters/ service specifically for Aboriginal language speakers	Housing
Service to Youth Council (SYC)	The Foundry by SYC	Requires referral	Business hours	City of Adelaide	Young people who are experiencing housing insecurity	▪ Social support ▪ Life skills programs ▪ Provision of basic needs or amenities ▪ Safe space ▪ Referral, care coordination, or support to access services	Housing and homelessness
Sister Janet Mead's Adelaide Day Centre for Homeless Persons	Adelaide Day Centre	Requires referral	Business hours	City of Adelaide	People experiencing homelessness	▪ Rehabilitation ▪ Provision of information ▪ Referral, care coordination, or support to access services ▪ Provision of basic needs or amenities ▪ Housing and homelessness support	Housing and homelessness

Organisation	Service name	Referral	Operational hours	Geographic area	Target client group/s	Services provided	Service type
The Salvation Army	The Salvation Army Sobering-up Unit	No referral needed	24/ 7	City of Adelaide	Intoxicated people	▪ Safe place to sober up ▪ Assessment of needs ▪ Referral, care coordination, or support to access services ▪ Provision of basic needs or amenities ▪ Advocacy ▪ Provision of information	Sobering up service
Uniting Communities	Kurlana Tampawardli	Info not available	Dependent on service - Crisis accommodation operates 24 hours	Suburbs further from Park Lands	Aboriginal people Rural/ remote Aboriginal visitors	▪ Crisis accommodation ▪ Transitional accommodation ▪ Safe return to Country ▪ Referral, care coordination, or support to access services ▪ Culturally safe services ▪ Outreach	Culturally safe housing and homelessness
Uniting Communities	Aboriginal Community Connect	Requires referral	Business hours	Multiple locations including suburbs close to Park Lands	Aboriginal people People who use alcohol and other drugs	▪ Rehabilitation ▪ Culturally safe service ▪ Referral, care coordination, or support to access services	Alcohol and other drug service

Organisation	Service name	Referral	Operational hours	Geographic area	Target client group/s	Services provided	Service type
Uniting Communities	New ROADS	Dependent on service	Business hours	City of Adelaide (counselling) Suburbs rehabilitation	People who use alcohol and other drugs	▪ Rehabilitation ▪ Detox ▪ Counselling ▪ Culturally safe service ▪ Referral, care coordination, or support to access services	Rehabilitation
DHS	Safer Place to Gather	No referral needed	Info not available	City of Adelaide	Aboriginal people who use alcohol and other drugs Aboriginal people experiencing homelessness Rural/ remote Aboriginal visitors	▪ Culturally safe service ▪ Referral, care coordination, or support to access services ▪ Supervised alcohol provision program	Services hub

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