

July 2026

Youth Justice (Circuit Breaker) Amendment Bill 2026

Luke Twyford, Principal Commissioner

1. Introduction

Objectives of the Bill

The Bill seeks to establish a Circuit Breaker Program (the program) with the stated objectives of improving community safety and reducing youth crime by establishing a structured rehabilitation program that removes young people, who have been charged with, or have committed offences, from the community.

The program is intended to be delivered by funded non-government service providers at two rural and/or remote locations where young people will receive round the clock supervision. These locations are intended to provide a controlled setting that removes high risk young people from negative peer influences and environments that enable offending behaviour.

A key component of the Circuit Breaker Program is structured activities and strict routines, including 'hands-on' learning where young offenders can gain practical knowledge, skills and experience. The program will also provide education, training, mentoring, activities and programs to support reintegration into the community. Circuit Breaker will be court-ordered and may be imposed on sentence or as a condition of a bail undertaking. The Bill provides for the proposed new court orders and necessary functions and powers to enable the operation of Circuit Breaker.

Previous Commission submissions

In previous submissions to State and Federal parliament regarding youth offending, I have consistently emphasised the need to balance community safety and the experiences of victims with an understanding of the developmental needs and life histories of children who offend - many of whom have experienced significant trauma, family violence, disability, disrupted education, unstable housing, substance use and disconnection from family and community, alongside prolonged involvement with multiple government systems. Youth justice responses must recognise that children are still developing and that offending behaviour often occurs within this broader context of disadvantage.

A successful youth justice response must achieve more than short-term behavioural compliance. It must support children to develop insight into their actions, build positive relationships, strengthen their capabilities and transition successfully back into their communities.

The effectiveness of the Circuit Breaker Program will depend on whether it operates as a rehabilitation-focused intervention. The key question is not only whether children are removed from environments associated with offending, but whether the alternative environment provides the relationships, supports and opportunities necessary to reduce offending upon their return, and therefore improve long-term outcomes.

2. What works – the evidence on rehabilitation

Children and young people in youth detention have a very different neurodevelopmental and mental health profile compared to others who are not in custody. National data highlights the extent of cumulative system involvement among children in the youth justice system. The Australian Institute of Health and Welfare's 2024 annual report on children under youth justice supervision found that Queensland had the highest number of children under youth justice supervision nationally during the 2022–23 reporting period.

It also recorded that Queensland had the second highest proportion of children (72.9%) who had previous contact with the child protection system in the ten years between 1 July 2013 and 30 June 2023. Notably, Queensland had more First Nations children aged 10 to 13 under youth justice supervision with prior child protection involvement than the total number of non-Indigenous children nationally in the same age group with comparable system contact.¹

¹ Queensland Family and Child Commission (November 2024), *Crossover Cohort: Young people under youth justice supervision and their interaction with the child protection system – Data Insights: Australian Institute of Health and Welfare*

In 2025, a total of 1,407 young offenders were surveyed in the Youth Justice Census.²

63 per cent	identified as First Nations young people
62 per cent	had experienced or been impacted by domestic and family violence
60 per cent	had a disability (assessed or suspected), including 23 per cent who had a cognitive or intellectual disability
53 per cent	were disengaged from education, training or employment
52 per cent	had at least one mental health or behavioural disorder (diagnosed or suspected)
35 per cent	had at least one parent who spent time in adult custody
26 per cent	had been living in unstable and/or unsuitable accommodation

As demonstrated by the Youth Justice Census, Aboriginal and Torres Strait Islander children are significantly over-represented throughout Queensland’s youth justice system. Any new youth justice intervention must be designed with careful consideration of the experiences, and the needs and strengths of First Nations children, families and communities.

Evidence from the Child Death Review Board (the Board) demonstrates that children who enter the youth justice system do so through predictable pathways of cumulative harm, rather than isolated criminal behaviour.³ Case reviews consistently show repeated system failure, including missed opportunities for early screening of neurodevelopmental and communication disorders, timely mental health and substance use support, and sustained assistance for families and carers.

Taken together, this evidence underscores that effective youth justice reform must prioritise early intervention, trauma-informed and relational approaches, culturally safe practice, and strong reintegration support.

CASE STUDY: Multi-Systemic Therapy (MST) as an Evidence-Based Youth Justice Intervention⁴

Multi-Systemic Therapy (MST) provides an example of an evidence-based intervention designed to address serious and persistent youth offending through a community-based, family-centred approach.

MST is an intensive, home-based therapeutic model used across North America, Australia and Europe for children and young people with complex behavioural needs, including chronic and violent offending. The model recognises that offending behaviour is influenced by a range of interconnected factors, including family dynamics, peer relationships, school engagement and broader community context.

Rather than removing the child from these environments, MST works directly within them. The intervention focuses on identifying and addressing the external drivers of offending behaviour, including limited family support, exposure to anti-social peer groups and disengagement from education. The program involves structured, intensive engagement over a defined period, typically including approximately 60 hours of direct therapeutic intervention delivered by trained professionals, alongside 24-hour crisis support over several months. Therapeutic techniques are grounded in evidence-based approaches, including cognitive behavioural therapy, and are tailored to the individual circumstances of the child and their family.

A central feature of MST is strengthening the capacity of parents and caregivers to respond to behavioural challenges and provide consistent support. This includes developing practical strategies, building confidence in

² Department of Youth Justice and Victim Support (2026) Unpublished correspondence

³ Child Death Review Board (2025) Child Death Review Board Annual Report 2024-25

⁴ Principal Commissioner Luke Twyford, Queensland Family and Child Commission. 2025. *Submission to Federal Inquiry into Australia's Youth Justice and Incarceration*

parenting approaches and connecting families with community-based support systems to sustain progress beyond the formal intervention period.

Evaluations of MST over several decades have demonstrated positive outcomes, including reductions in reoffending and decreased likelihood of young people being removed from their family environment. Long-term studies have reported reductions in recidivism across a range of cohorts, alongside broader social and economic benefits.

Economic analyses have also identified MST as a cost-effective intervention. Evaluations since the 1980s have shown MST to be effective in reducing recidivism and removal of violent youth from their family. Various evaluations rate the long-term reduction in recidivism between 25% and 70%. In 2003, Aos listed MST as the most cost-effective crime prevention intervention in the USA. In a 2009 cost-benefit analysis it was found to reduce recidivism by 7.7% and deliver total taxpayer benefits of \$17,694 per program participant over 10 years.

This case study highlights the importance of ensuring that investment across the youth justice system supports approaches that are evidence-informed, outcome-focused and capable of delivering sustained behavioural change.

3. Applying lessons learned

The establishment of a new youth justice intervention provides an opportunity to apply lessons from previous programs and strengthen Queensland's approach to rehabilitation. Evaluation of programs of detention-adjacent rehabilitation programs piloted in Queensland provide important evidence about the design features required for effective outcomes.

The evaluation of Queensland's Youth Boot Camp program undertaken by KPMG in 2015⁵ identified limited evidence that the program reduced recidivism and found that objectives relating to family and community engagement were largely not achieved. While the evaluation did not suggest that structured interventions for children who engage in serious offending are ineffective, it highlighted the importance of ensuring that such programs are appropriately designed, sufficiently resourced, culturally responsive and connected to broader support systems. International evidence regarding discipline-focused boot camp approaches demonstrates that harsh, punitive environments alone do not produce sustained reductions in offending.

The KPMG evaluation of Queensland initiatives identified that future programs for children with entrenched offending behaviours should:

- be flexible and individualised;
- include strong family involvement;
- consider accessibility and connection to community;
- tailor program duration and participant cohorts;
- strengthen transition and reintegration supports; and
- be subject to ongoing evaluation.

The effectiveness of the Circuit Breaker Program will depend on whether relationship-based behaviour change is the primary mechanism for change, giving young people the opportunity to learn, repair harm and build capability, supported by consistent and predictable structure.

⁵ KPMG. 2015, Final Report for the evaluation of Queensland's Youth Boot Camps

Maintaining family and kinship connections

Family involvement is a critical component of rehabilitation and reintegration. Children who participate in the Circuit Breaker Program will be removed from their usual environments, potentially including separation from parents, siblings, extended family, kin and community supports. While separation may be necessary in some circumstances to interrupt offending patterns, it should not result in the loss of protective relationships.

The proposed Circuit Breaker Program has the potential to create additional risks for children if removal from their communities results in further disconnection from family, kin, culture and Country. For Aboriginal and Torres Strait Islander children, connection to culture, community and identity are critical protective factors that support wellbeing, resilience and positive development.

The Commission recommends that the program require individualised family connection plans for each child, including regular communication with family and support networks, opportunities for visits where safe and appropriate, involvement of families in rehabilitation planning and transition planning that supports successful return to community.

As I have said in my major youth justice reform submissions, the youth justice system cannot replace or ignore the responsibility of parents, and too often by excluding parents and family from the solution, it ignores the biggest opportunity to reestablish a positive life intervention for young people.

Given the proposed residential and remote nature of the program, independent culturally informed oversight will be important. The program should provide for the involvement of community visitors or equivalent culturally authoritative oversight mechanisms for children participating in the program. Independent oversight provides an additional safeguard to ensure children's safety and wellbeing are being upheld.

Transition planning

In the 2024 *Exiting Youth Detention* report⁶, the Commission recommended that the Queensland Government fund and deliver a dedicated 12-month post-detention transition program that incorporates in-home family interventions and effective engagement in education, training and employment. The Queensland Government introduced the Staying on Track program in 2025 - offering a 12-month post-detention rehabilitation program to reintegrate young people back into the community and prevent them from falling back into a cycle of crime.

It is of interest to the Commission how the Circuit Breaker program will connect to the Staying on Track program. The Commission recommends that program design include mechanisms to support:

- continuity of education and training;
- access to health and therapeutic services;
- disability assessment and support where required;
- family and community engagement;
- transition planning; and
- ongoing case management following completion.

Transition planning should begin early and involve the child, family, service providers and relevant government agencies. The Commission recommends that completion of the Circuit Breaker Program be connected to comprehensive post-program case management, including continued access to education, health, family support and community services, consistent with the supports provided under the Staying on Track program, and aligned with the recommendations in the Commission's *Exiting Youth Detention* report.

⁶ Queensland Family and Child Commission. 2024, *Exiting youth detention: Preventing crime by improving post-release support*

4. Suitability decisions and value for public investment

The Bill provides the Chief Executive with discretion to determine a child's suitability for participation in the Circuit Breaker Program based on a suitability report. Decisions of this nature should be supported by clear, transparent and consistently applied criteria. At present, the Bill does not specify legislated criteria or review mechanisms for suitability assessments. Given the significance of the decision for the child, including its potential impact on family, cultural connection and developmental outcomes, the framework should be strengthened to support consistency, transparency and accountability in decision-making.

Evidence from the 2015 KPMG evaluation of Queensland's Youth Boot Camp program provides insight into the cost profile of remote, residential youth justice interventions. The evaluation found that the Sentenced Youth Boot Camp operated at a significantly higher daily cost than detention at the time. This reflects the inherent cost structure of small-scale, residential programs, particularly in remote locations where infrastructure, staffing and operational requirements must be maintained regardless of occupancy levels. Unlike larger custodial facilities, residential programs of this nature may not achieve efficiencies of scale. As placements are driven by court decisions, occupancy levels may fluctuate, while fixed operational costs remain constant. This can affect the overall cost-effectiveness of the model. The evaluation also found no clear evidence of reduced reoffending compared to other cohorts. While this does not preclude the effectiveness of future programs, it highlights the importance of ensuring that new models are designed, implemented and evaluated in a way that can demonstrate improved outcomes relative to their cost.

System-level investment

Recent findings by the Queensland Audit Office⁷ have identified broader challenges in youth justice funding and program evaluation. These include limited articulation of the rationale for investment in specific programs; gaps in linking expenditure to outcomes, including trends in offending and reoffending; and variability in procurement and contract management practices.

The Commission's *Buyer Beware* report identified risks associated with market-based delivery of services for vulnerable children, particularly in settings where demand is driven by statutory decisions and cannot be easily adjusted. In these contexts, governments may have limited flexibility to reduce or discontinue services, even where performance concerns arise. This can affect the balance of incentives within the system and underscores the importance of strong commissioning, contract management and oversight arrangements.

The Crime and Corruption Commission released a report in 2018⁸ on corruption risks in Queensland's prison system. The report similarly noted that privately operated custodial or detention-like environments require robust oversight to ensure transparency, appropriate standards of care and accountability. These insights are relevant to the design of the Circuit Breaker Program, particularly given its residential and potentially remote delivery model.

Opportunity cost and alignment with system priorities

Queensland spends more on youth justice services than any other jurisdiction. In Queensland the real recurrent expenditure on youth justice services for 2024-25 was \$298 million an increase of 14 per cent from just over \$260 million in 2023-24. The cost of detention-based supervision per young person has increased by 21% to \$2,713.94 per child per day in 2024-25.

In Queensland, 93 per cent of young offenders released from detention reoffend within 12 months. Given that detention episodes fail to prevent reoffending in more than 90 per cent of cases, this more than \$990,000 investment per child per year warrants examination of whether investment settings reflect an appropriate balance between short-term and long-term community-based expectations.⁹

⁷ Queensland Audit Office. 2024, *Reducing serious youth crime: Report 15: 2023-24*

⁸ Crime and Corruption Commission. 2018, *Taskforce Flaxton: An examination of corruption risks and corruption in Queensland prisons*

⁹ Productivity Commission. 2026, *Report on Government Services 2026: 17 Youth justice services*, Tables 17A.10, 17A.11, 17A.20

Detention based supervision (2024 25)	Community based supervision (2024 25)
Cost per average day per young person	Cost per average day per young person
\$2,713.94	\$493.17

The Circuit Breaker Program should be supported by strong governance, clear performance expectations and robust evaluation to ensure that public investment delivers improved outcomes for children and contributes to community safety.

5. Oversight and safeguards in a detention-adjacent setting

The establishment of the Circuit Breaker Program creates important child safeguarding responsibilities. Children participating in the program will be placed in residential environments where they may experience significant restrictions on their movement, daily activities and contact with their usual support networks. In these circumstances, children are reliant on the adults and organisations responsible for their care to create environments that are safe, respectful and responsive to their needs.

The Bill proposes to prescribe circuit breaker providers as child safe entities and reporting entities under the *Child Safe Organisations Act 2024*. The Commission supports this approach, as it ensures that providers delivering services to children in a high-risk setting are subject to Queensland's child safeguarding framework. However, prescription as a child safe entity and reporting entity must be accompanied by appropriate preparation, guidance and regulatory oversight to ensure providers understand and can meet their obligations.

Safeguarding risks in remote and rural settings and State responsibility for the safety of children

The proposed Circuit Breaker Program will operate in residential settings where children may be separated from their usual communities and support networks. Evidence from inquiries into institutional child abuse demonstrates that environments where children are dependent on adults, isolated from external oversight and subject to significant power imbalances require strong safeguards.

The Royal Commission into Institutional Responses to Child Sexual Abuse identified that detention and other total institution environments can present elevated risks of abuse due to factors including: power imbalances between children and adults; limited privacy and autonomy; opportunities for inappropriate adult-child interactions; organisational cultures that may discourage reporting; and barriers to external scrutiny. The proposed remote nature of circuit breaker locations increases the importance of ensuring children have access to independent support and that external oversight mechanisms are capable of identifying concerns early.

The delivery of the Circuit Breaker Program through non-government providers creates important accountability considerations. Where government contracts with external organisations to deliver services to children, responsibility for ensuring children's safety remains with the State.

The Commission's *Buyer Beware* report highlighted broader risks associated with market-based approaches to essential services, including the potential for financial incentives and operational pressures to affect service quality if strong governance and accountability mechanisms are not established.

While the circumstances of youth justice services differ across sectors, the underlying principle remains relevant: children's safety and wellbeing must remain central to commissioning, contracting and monitoring arrangements.

The Commission should have appropriate access to information necessary to perform its regulatory functions, including information about systemic risks, reportable conduct matters and provider performance.

Consistent reporting obligations under the Reportable Conduct Scheme

The Commission has a direct regulatory interest in ensuring that reporting obligations applying to circuit breaker providers are clear, consistent and effective. The Bill proposes a new reporting obligation under the *Youth Justice Act 1992* requiring circuit breaker providers to report harm to children under proposed section 282X, including creating a personal offence for a reporting entity — a provider, employee or contractor — who fails to report harm.

The proposed changes also create the potential for overlapping reporting obligations. Providers may have obligations under both:

- the *Youth Justice Act 1992*, in relation to harm to children participating in the Circuit Breaker Program; and
- the *Child Safe Organisations Act 2024*, in relation to reportable conduct.

These frameworks serve important but different purposes. However, without clear guidance and coordination mechanisms, there is a risk of confusion about the definitions of harm, thresholds, timeframes and the cross-notification mechanism between frameworks.

Proposed section 282X(4) provides that it is a reasonable excuse for a reporting entity not to report harm to a child where the report might tend to incriminate the reporting entity. Such a protection does not exist in the *Child Safe Organisations Act* and it is unclear why one is necessary. When it comes to the safety of children, adults should be required to self-incriminate where they have taken on paid responsibility for the care of a child.

The Commission notes that this provision will operate alongside the reporting obligations that will apply to circuit breaker providers as reporting entities under the *Child Safe Organisations Act 2024*. The Commission has consulted with the Department about the interaction between these two reporting frameworks, including the treatment of self-incrimination under proposed section 282X(4). Given the Department's role in leading the drafting and policy intent of the *Youth Justice Act* provisions, the Commission recommends the Department continue to progress this alignment, to ensure providers, employees and contractors have a clear and consistent understanding of their reporting obligations across both Acts.

The Commission recommends that clear operational guidance be developed before commencement of the program to ensure providers understand how overlapping obligations interact. Consideration should also be given to establishing clear cross-notification arrangements between relevant agencies to support timely information sharing and coordinated responses.

Electronic monitoring, recording and privacy safeguards

The Bill authorises circuit breaker providers to record images and sound at program sites. Exemptions are provided for privileged and sensitive communications, including with a lawyer, law enforcement, the Ombudsman, a community visitor, a child advocacy officer, the Public Guardian, and the Human Rights Commissioner.

The Bill provides for every child participating in the Circuit Breaker Program to wear an electronic monitoring device under proposed section 206E. The Commission has previously raised concerns, in its submission to the *Youth Justice (Electronic Monitoring) Amendment Bill 2025*, regarding the disproportionate impact of electronic monitoring conditions on Aboriginal and Torres Strait Islander children, including the risk of compounding trauma through practices that reflect historical patterns of surveillance and control, and the burden placed on families and carers where compliance responsibilities extend to them. The Commission also notes that the Bill enables a regulation to prescribe how electronic monitoring data, including location data, may be shared. Given the sensitivity of this information, the Commission recommends that any such regulation include clear limits on the purposes for which monitoring data may be used and shared, and safeguards to prevent its use in ways that could disproportionately affect First Nations children or their families.

Use of force and restrictive practices

The Bill provides for circuit breaker providers to use reasonable and necessary force to remove a visitor who does not comply with a request to leave a site and requires staff exercising this power to have completed targeted physical intervention training. The Commission notes that the Bill does not appear to include an equivalent, explicit legislative framework governing the use of force or restrictive practices in relation to children participating in the program. Given the residential and highly structured nature of the program, and the elevated risk that restrictive practices can traumatise children and mirror precursors to abuse, the Commission recommends that clear legislative or regulatory expectations and limits be established governing the use of restrictive practices with children at circuit breaker sites, including training, reporting and review requirements consistent with those applied in other child safe and youth detention settings.

6. Complaints and access to independent support

Children participating in the Circuit Breaker Program must have meaningful access to independent advice, advocacy and complaints mechanisms. The Bill requires providers to assist children to access legal representation. That access should be supported through clear and enforceable arrangements. Remote locations may create practical barriers to accessing lawyers, engaging independent advocates, making complaints, maintaining contact with family and support networks and receiving visits from oversight bodies.

The Commission welcomes the Bill's extension of visitable site status to circuit breaker sites under the *Public Guardian Act 2014*, ensuring community visitors have a legislated basis for independent oversight of these settings. The Commission notes, however, that the Public Guardian's access under these provisions is subject to limitations: a provider has a reasonable excuse not to disclose information where doing so could reasonably be expected to prejudice the security or good order of the site, and the Public Guardian's power of entry may be subject to a direction given by the chief executive for reasons of security, management, or the safe custody and wellbeing of children at the site. While these are legitimate operational safeguards, the Commission recommends they be applied narrowly, transparently, and subject to review, to ensure they are not used in a way that undermines the effectiveness of independent oversight.

The Commission also notes that this visitable site mechanism applies to the Public Guardian specifically, and recommends the Department confirm how the Queensland Ombudsman's existing complaint-handling jurisdiction will operate in practice alongside this scheme, to ensure children and families have clarity about the full range of independent bodies available to them. The Commission recommends that the program establish minimum requirements for:

- confidential and regular access to legal services;
- access to independent advocacy;
- child-friendly complaints mechanisms;
- regular oversight visits from the Public Guardian and First Nations community visitors, and clarity on the Ombudsman's complementary complaint-handling role.

The Commission notes that the Bill leaves the detail of complaints handling largely to instructions issued by the chief executive, with the chief executive not required to deal with a complaint reasonably believed to be trivial or made only to cause annoyance. The Bill does not itself establish a legislated pathway for a child to escalate a complaint to an independent body if dissatisfied with the outcome or handling of a complaint at the provider or departmental level.

Given the residential, remote and detention-adjacent nature of the program, the Commission recommends that complaints-handling arrangements guarantee a child's right to escalate a complaint to an independent body, such as the Ombudsman or the Commission, as of right, rather than at the discretion of the chief executive. Systemic issues identified through oversight activities should be publicly reported, to support transparency about the program's effectiveness in addressing offending behaviour and promoting community safety.

Activities must have a genuine educational or vocational purpose

The Commission acknowledges the Bill's intention to provide children participating in the Circuit Breaker Program with opportunities to develop practical knowledge, skills and experience through structured activities, education and training. However, activities undertaken as part of the program must remain clearly connected to educational, therapeutic and vocational objectives, including that:

- all practical activities must have a genuine educational or vocational purpose;
- activities must be age-appropriate and suitable for the child's abilities and circumstances;
- participation must comply with applicable child employment, workplace health and safety and education requirements;
- activities must not be used as a form of punishment or behavioural control; and

- children must have access to mechanisms to raise concerns about activities they consider unsafe or inappropriate.

A rehabilitation model should support children to develop skills and confidence and must be delivered in a way that upholds their dignity and safety at every stage.

7. Evaluation, performance reporting and continuous improvement

The introduction of a new youth justice intervention provides an opportunity to strengthen Queensland's evidence base about what supports children to stop offending and successfully participate in community life. The Commission considers that evaluation should be embedded into the design of the Circuit Breaker Program from commencement. The effectiveness of the program should be assessed against outcomes that reflect both community safety and child wellbeing.

The Commission recommends that the Bill or associated governance arrangements provide for an independent evaluation within an appropriate timeframe, with findings publicly reported to support transparency and system improvement. A program involving significant public investment and the placement of children in restrictive residential environments must be capable of demonstrating whether it is achieving improved outcomes.

8. Conclusion

The Commission acknowledges the importance of developing effective responses to serious youth offending that support community safety and help children change their behaviour. Its success will depend on whether it is designed and implemented as a rehabilitation-focused, trauma-informed and accountable response, rather than a model centred primarily on restriction and control. This includes ensuring children are safe, rehabilitation is effective, and public investment delivers measurable improvements in community safety and long-term outcomes.

The Commission recommends that the Bill and associated program design be strengthened to ensure the Circuit Breaker Program operates as a safe, effective and accountable rehabilitation intervention as follows:

1. **Strengthen governance and suitability decision-making.** Establish clear, legislated criteria and review mechanisms for suitability decisions, supported by a defined theory of change and transparent performance reporting to demonstrate value for public investment.
2. **Embed family, kinship and cultural connection.** Require individualised plans that maintain and strengthen family contact, kinship relationships and cultural identity for every child, with meaningful involvement of Aboriginal and Torres Strait Islander community-controlled organisations where appropriate.
3. **Ensure integrated rehabilitation and reintegration support.** Embed access to education, health, disability and therapeutic services throughout participation, with early, coordinated transition planning and ongoing post-program case management.
4. **Align child safety regulation and reporting obligations.** Progress alignment between section 282X and reporting obligations under the *Child Safe Organisations Act 2024*, with clear operational guidance and cross-notification arrangements established before commencement.
5. **Strengthen independent oversight and safeguards.** Establish robust independent monitoring, including unannounced visits and culturally informed community visitor involvement; establish clear legislative or regulatory standards governing the use of restrictive practices with children; and guarantee children a legislated right to escalate complaints to an independent body.
6. **Embed independent evaluation and continuous improvement.** Require an independent evaluation within a defined timeframe, incorporating First Nations-led evaluation methodology, with public reporting to support transparency and ongoing system improvement.