1. The evidence of Norman Latham is summarised in the Submissions of Counsel Assisting the Royal Commission.  

2. In 1962, when he was 15 years old, Mr Latham had run away from home. While he was sleeping homeless, he was molested by a man impersonating a police officer. Police arrested the man and took Mr Latham into custody too.

3. Police prepared a statement which he signed. He told the Royal Commission the statement was not an accurate account of how he came to the attention of police. He said he was barely literate and could not read. He said police directed him to sign it and he did.

4. Although he had committed no offence, Mr Latham was made a Ward of State on grounds he was "likely to lapse into a career of violence and crime" and was detained at Turana.

5. He told the Royal Commission, whilst in the care of the Department at Turana, he was raped multiple times by two Youth Officers, Wilkie and Horne.

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1 Submissions of Counsel Assisting, paragraphs 57-78.
2 Norman Latham C8871 line 44 - C8872 line 8.
3 Norman Latham C8872 line 18 - C8873 line 10.
6. He absconded several times after episodes of rape.
7. He never complained about the rapes to anyone because he believed the threats of Wilkie and Horne that he would be moved to Turana's high security section, Poplar House, if he reported them.
8. He told the Royal Commission, on the last occasion he was raped, he absconded again. Police, who picked him up, asked him why he had absconded. When he said he was being raped at Turana a policeman assaulted him. 
9. He said when he was returned to Turana he was bruised and sore. His request to see a nurse was refused.
10. A former Turana Youth Officer, Ashley Cadd, told the Royal Commission the recruitment practices at Turana were directed to the control of boys and not their welfare. He said that control was undertaken largely by punishment.
11. Mr Cadd said the work culture was to cover up any incidents that occurred in relation to welfare of the residents.
12. He said when reports were prepared about boys they were often inaccurate and misleading.
13. He said the inadequacy of the night time supervision of the boys in their units was horrific.
14. According to Mr Cadd, the common profile of the Turana Youth Officers in 1968 was ex-army and ex-police personnel.
15. He said none of Youth Officers had any training in youth management.

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4 Joseph Marijancevic gave evidence of the brutal conditions of Poplar House. T 8901 line 28 to T-8903 line 24.
5 Norman Latham C8874 line 35 - C8875 line 3.
6 Norman Latham C8875 line 1-23.
7 Ashley Cadd C 9032 line 40-45.
8 Ashley Cadd C9032 line 47 - C9033 line 1.
9 Ashley Cadd C9033 line 28-37.
10 Ashley Cadd C9033 line 39-44.
11 Ashley Cadd C9033 line 46 - C9034 line 8.
12 Ashley Cadd C9032 line 27-35.
13 Ashley Cadd C9032 line 37-38.
16. The sexual abuse had a profound effect on Mr Latham. He had nightmares and flashbacks; he drank to forget.\textsuperscript{14}

17. However, on release, without any Department assistance to obtain accommodation or work, Mr Latham obtained both on his own. He married, had a daughter and drove interstate trucks for 42 years.\textsuperscript{15}

18. He kept his abuse secret from his wife for 12 years.\textsuperscript{16}

19. In 2009, with the support of a counsellor, he finally reported the abuse to police.\textsuperscript{17}

20. It is submitted Mr Latham showed great courage in presenting himself to be questioned at the hearing and identifying himself publically as a victim of child sexual abuse.

21. He said his reason for telling his story to the Royal Commission was his desire to get the truth out (and) hopefully prevent it from happening to any other children in the future.\textsuperscript{18}

22. It is submitted, in so far as they are apposite to the experiences of Mr Latham, this Royal Commission should accept the submissions of Counsel Assisting in relation to available findings.

23. It is submitted in making such findings, the Royal Commission should take into account the evidence of the current Department Head, Dr Pradeep Philip, who acknowledged, when Norman Latham was held at Turana:
   - The Department had failed to protect Norman Latham from sexual abuse.\textsuperscript{19}
   - There were serious deficiencies in the recruitment of employees at Turana.\textsuperscript{20}
   - Training of Youth Officers at Turana was not adequate.\textsuperscript{21}

\textsuperscript{14}Norman Latham C8875 line 17-19
\textsuperscript{15}Norman Latham C8876 line 3-42.
\textsuperscript{16}Norman Latham C8876 line 44-46.
\textsuperscript{17}Norman Latham C8877 line 14-36.
\textsuperscript{18}Norman Latham C8881 line 7-14.
\textsuperscript{19}Dr Pradeep Philip C9937 line 35-38.
\textsuperscript{20}Dr Pradeep Philip C9937 line 44-46.
\textsuperscript{21}Dr Pradeep Philip C9938 line 20-24.
• Placing together boys who had not offended against the
criminal law with boys who had, put vulnerable children at
risk.\textsuperscript{22}

Douglas Wilkie

24. In these submissions we have not sought to justify the reliability of
Mr Latham’s account of his sexual abuse by Youth Officers, Wilkie
and Horne.

25. Mr Latham told the Royal Commission Douglas Wilkie, one of
Turana’s Youth Officers, raped him nine times. Mr Wilkie has denied
the allegations.

26. Mr Wilkie was represented by Mr B Young QC.

27. Mr Young made lengthy oral submissions to supplement written
submissions in support of an application to suppress Mr Wilkie’s
name from publication.\textsuperscript{23}

28. The Royal Commission identified two bases for the application,
namely:
   a. Mr Wilkie’s right to privacy outweighed the public interest in
      exposure of his identity;
   b. The \textit{inherent unreliability} of the allegations Mr Latham had
      made against him.\textsuperscript{24}

29. The Royal Commission has noted it is not within the scope of the
inquiry to make any finding of guilt and will not do so.\textsuperscript{25}

30. And, while \textit{inconsistency} in Mr Latham’s evidence is not relevant to
this Inquiry,\textsuperscript{26} it is submitted the Royal Commission has heard
evidence which supports the cogency of Mr Latham’s account.

31. It is submitted some of the evidence supports the allegations which
Mr Latham has made.

\textsuperscript{22} Dr Pradeep Philip C9938 line 26-36.
\textsuperscript{23} Mr B Young QC c8796 line 18-C8813 line 10.
\textsuperscript{24} Presiding Member C8819 line 22-29.
\textsuperscript{25} Presiding Member C8821 line 29 C8822 line 1.
\textsuperscript{26} Presiding Member C8821 line 29-31.
32. For example, Ashley Cadd described Mr Horne as frightening and told the commission of an occurrence of very irregular night time behaviour at the Turana units by him.\(^{27}\)

33. It is submitted there is other evidence before this Royal Commission which explains some of the inconsistencies in Mr Latham’s account.

34. For example, David Green told the Royal Commission boys at Turana were often moved temporarily between units due to overcrowding, and not every movement of every boy was recorded.\(^{28}\)

35. Doctor Lloyd Owen told the Royal Commission Quamby and Coolibah units were separate units housed in the same building and separated by a passageway.\(^{29}\)

36. It is submitted these pieces of evidence may well account for the inconsistency between Mr Latham’s evidence he was abused while housed in Quamby and his Turana file which record he was housed in Coolibah.\(^{30}\)

37. It is further submitted Mr Latham gave a plausible explanation for his signature to a police statement, dated 13 January 1962, which set out an account, which differed from his evidence, of the circumstances in which police picked him up at Port Melbourne.\(^{31}\)

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Aickin Chambers
Melbourne
Counsel for Norman Latham
9 November 2015

\(^{27}\) Ashley Cadd C9031 line 25-40.
\(^{28}\) David Green C9078 line 19-34.
\(^{29}\) Doctor Lloyd Owen C9529 line 47 - C9530 line 9.
\(^{30}\) See Mr Young QC’s oral submissions at C8808 line 40 – 8809 line 7.
\(^{31}\) See paragraph 3 supra