



20 August 2025

Domestic, Family and Sexual Violence Prevention Division
Department of Children and Families
NT Government

Via email: dfv@nt.gov.au

Dear Domestic, Family and Sexual Violence Prevention Division,

RE: Draft Refreshed Domestic, Family and Sexual Violence Reduction Framework 2025 – 2028

The Northern Territory Council of Social Service (NTCOSS) is the peak body for the social and community service sector in the Northern Territory (NT). NTCOSS's membership is comprised of community managed, non-government, not for profit organisations, which work in social and community service delivery, sector development and advocacy.

NTCOSS advocates for and with the domestic, family and sexual violence (DFSV) sector (the Sector) in the NT to improve safety, wellbeing, economic and social justice outcomes for impacted individuals and communities. The Sector includes Aboriginal Community Controlled DFSV services, Aboriginal Family Violence Legal Services, remote safe houses, women's shelters, DFSV specialist counselling services, women's legal services and specialist sexual violence services. The Sector and associated peaks are committed to working with the NT Government to support and enable partnership.

Thank you for considering our input below regarding the *Refreshed Domestic, Family and Sexual Violence Reduction Framework 2025–2028* (the Framework). Many of the Sector have made their own submissions regarding the refreshed Framework and several are co-signatories here.

NTCOSS and members will also develop a response to the *Report to the Legislative Assembly* on the findings and recommendations of the Territory Coroner regarding the death of Miss Yunupinju, Ngeygo Ragurk, Kumarn Rabuntja and Kumanjayi Haywood. There has not been sufficient time to do this thoroughly via this submission process. We do however make comment below where there are significant missed opportunities regarding the Coroner's recommendations.

Our response addresses the following priorities:

1. Consultation with the social and community sector

The Sector places strong value on meaningful consultation with the NT Government. This is the foundation for effective collaboration and robust policy outcomes that will reduce

violence and save lives. The development of this Framework has not exemplified meaningful consultation, and we highly recommend future reform processes do.

2. Opportunities to strengthen the drafted Framework:

An effective Framework will be grounded in trauma-informed, community-led approaches where Aboriginal people and communities have genuine decision-making power in the design and delivery of services. As such:

- New and existing funding should prioritise Aboriginal-led, community-controlled models across all domains.
- Therapeutic responses and alternatives to custody are evidenced in their efficacy in reducing DFSV and should be prioritised over correctional or enforcement-led interventions.
- Ongoing investment into the Primary Prevention Grants Program should be maintained.
- NT Government guidelines should be amended so that grant funding terms and conditions for specialist DFSV services explicitly include indexation that is commensurate with real cost of living increases, and ensure those services are exempt from efficiency dividends and budget measures (Coroner's recommendation 35).

NTCOSS holds concerns that initiatives for NT government agencies are to be delivered using 'existing resources'. This indicates a lack of comprehension of the level of system reform required to adequately respond to the rates of violence experienced by Territory women and children, while also addressing the drivers to prevent it happening in the first place.

3. Other considerations:

NTCOSS would like consideration of the following inclusions:

- The identification of sexual violence as a distinct issue in the Framework.
- The breakdown of investment into NT regions.

1. Consultation

The NT DFSV sector values meaningful consultation with the NT Government. Consultation is the foundation for effective collaboration, robust policy and real-world outcomes. In contrast, fragmented one-on-one engagement with individual service providers risks misrepresenting sector views, resulting in a loss of trust.

Consultation enables the voices and lived experiences of frontline workers, victim-survivors, families, and communities across the Territory to be heard and respected. This fosters trust, couches the reform agenda in a partnership between the sector and the NT government, enhances cultural safety, and ensures initiatives are tailored to the NT's unique social, cultural, and geographic context. This contributes to safer communities and better outcomes for victim-survivors.

NTCOSS recommends adopting the following approach to consultation with the NT's specialist DFSV sector to ensure consultation is not merely procedural but in genuine partnership:

- Communicate potential policy, process or funding changes upfront.
- Proactively seek input on specific issues, policies, or proposals. This process should ensure equitable opportunities for participation, particularly for Aboriginal and Torres Strait Islander peoples, Aboriginal Community Controlled Organisations and organisations operating in remote communities.
- Ensure the Sector has adequate time to respond to the proposed changes.
- Adopt an agreed process and platform for collective input, enabling open discussion in group settings that promote transparency, shared understanding, and a consistent sector voice.
- Ensure that feedback mechanisms are guided by the ways Aboriginal community representatives prefer to communicate to ensure consultation is culturally safe and respectful of local protocols.
- Ensure there is sufficient time allocated to meaningful engagement that is respectful of collective decision making.
- Adopt a transparent mechanism to show how feedback has been considered and integrated into decision-making.

2. Feedback on refreshed Framework

The Sector are pleased to see commitments to new and ongoing funding in the Framework, across all domains. We welcome the additional, ongoing investment of \$36 million to the prevention of and response to DFSV in the NT. This was a key ask of the sector for many years, and we acknowledge the NT Government has delivered upon this.

The Framework includes crucial initiatives that will contribute to responding to the impact of DFSV in Territory communities. However, there are also opportunities to strengthen this framework with targeted, evidence-based approaches.

Prevention

The long-term investment in prevention activities which address the drivers of violence against Aboriginal and Torres Strait Islander women is crucial if we are to reduce DFSV in the NT. This must include engaging with Aboriginal and Torres Strait Islander peaks, organisations, communities and people to ensure self-determination and local decision making.

Opportunities to improve the NT's commitment to prevention:

- Maintain the same ongoing annual investment in the Primary Prevention Grants Program.
- As recommended by Our Watch, prioritise the prevention of violence against Aboriginal and Torres Strait women by including an action to resource Aboriginal and/or Torres Strait Islander organisations to lead primary prevention projects

- Embed intersectionality as a core principle in prevention initiatives.
- Resource the implementation of Respectful Relationships Education across the Northern Territory.
- Ensure primary prevention is included in all sector development activities.

Early Intervention

The refreshed Framework makes significant new investments in early intervention programs (\$10.2 million). However, this new funding has been allocated to the Circuit Breaker program, which does not clearly contribute to the early intervention of DFSV for young people (as per Coroner’s recommendation 15); and to DFV programs for people in prison. The framing of DFSV as a justice and law and order issue is contrary to evidence and against the recommendations of the Sector.

Opportunities to improve the NT’s commitment to early intervention:

- Ensure government initiatives such as Circuit Breaker are designed in formal partnership with DFSV specialist services, integrated into the DFSV service system with clear role delineation, established referral pathways and shared case management protocols.
- External evaluation and review of the Circuit Breaker program to ensure DFSV related harm to children and young people is being averted in the short, medium and long-term.
- Investment in local, community led, early intervention program development and implementation with children, families and young people.

Response and recovery

NTCOSS welcomes consideration of how to best support the recovery of victim survivors. Initiative 27, a centralised service hub, has not been raised by NTCOSS members and stakeholders within the DFSV sector as a priority. While the sector does struggle with a high number of turn-aways and people not being able to access the help they need, this is largely due to a lack of capacity rather than ineffective contact pathways or entry points. An immediate and impactful initiative would be to ensure indexation of NT grant funding to specialist DFSV services (Coroner’s recommendation 35).

Opportunities to improve the NT’s commitment to response and recovery

- A review of data on “number of unassisted persons” reported by specialised DFSV services and commensurate uplift in programmatic capacity.
- A centralised, overnight intake service could be beneficial to reduce the time clients and workers spend ringing around to find where beds are available.
- An amendment of NT Government guidelines so that grant funding terms and conditions explicitly include indexation that is commensurate with wage and superannuation guarantee increases, real cost of living increases, and ensure those services are exempt from efficiency dividends and budget measures (Coroner’s recommendation 35).

Systemic enablers and reform

The whole-of-government approach in the Framework (initiative 36) is not as recommended by the Coroner (recommendation 1) and is a missed opportunity to ensure a whole-of-government coordination mechanism with multi-agency oversight and multi-agency responsibility and accountability for DFSV reform. We acknowledge the inclusion of roles for key agencies and coordination by Department of Children and Families (as per initiative 26) and hope the reduction of funding for whole of system coordination after 2025/26 does not undermine this important mechanism.

We are supportive of NTG's implementation of RAMF and as RAMF Champion Coordinator for several universal services, but would like to stress the enormity of this undertaking for NTG agencies without additional resourcing.

Recruitment and retention of workforce continues to be one of the most significant issues faced by the DFSV sector. NTCOSS advocated for the development of a resource centre (initiative 28) and supports the development of practice standards. It is vital these are co-designed and developed with the sector to reflect the complexity of the NT context. These standards should be grounded within evidence and with a strong focus on safety.

It should be noted that a DFSV Training and Resource Centre is not an adequate substitute for a peak body for DFSV in the NT (coroner's recommendation 2). A dedicated peak body would have mechanisms to collect the perspectives and insights of the Sector across the NT, represent its needs and challenges, support the DFSV workforce and ensure that victim-survivor perspectives are heard to a far greater extent than is possible with the current, fragmented funding arrangement of a Training and Resource Centre and two policy officers that sit within other specialist peaks.

Opportunities to strengthen system enablers and reform:

- Adequately establish and fund whole-of-government system coordination as per the Coroner's recommendation 1.
- Adequately fund RAMF implementation for the NTG, non-government health sector, and social and community sector.
- Following consultation about the appropriate model, establish and adequately fund a peak body for DFSV in the NT (coroner's recommendation 2).
- Ensure that the DFSV Training and Resource Centre is designed in formal partnership with DFSV specialist services.

Monitoring and evaluation, and governance

NTCOSS commends the commitment to rigorous monitoring, evaluation and accountability. However, additional detail should be provided in this Framework regarding how these evaluations will be undertaken, including timeframes for completion, and alignment with Closing the Gap targets.

Opportunities to strengthen the monitoring and evaluation of this Framework:

- Align monitoring and evaluation with national frameworks which follow best practice principles for evaluation and include:
 - Engaging people with lived expertise
 - Ethical and trauma-informed practice
 - Decolonising, culturally safe and First Nations evaluation approaches
 - Indigenous data sovereignty
 - Co-design and participatory approaches.
 - See *AIATSIS Code of Ethics*, the *Australian Evaluation Society First Nations Cultural Safety Framework*, and the *Productivity Commission Indigenous Evaluation Strategy* for further information
- Address data gaps through increasing funding and investing in infrastructure for service providers to improve their data capabilities. Support population-level and program-level monitoring of outcomes to build evidence about the impact and outcomes of investment, understand what works, adapt and improve design and implementation of strategies and initiatives and to inform policy and investment decisions.
- Clarification regarding the planned evaluations, currently titled “Annual Review”, “Evaluation”, “Review”, and “Annual Reflection”, will ensure stakeholders know what to expect of these reviews and what processes will be undertaken (e.g. internal audits, quantitative / statistical review, service user feedback).
- Commit to making all forms of evaluation publicly accessible, within reasonable and concrete timeframes to assist all Territorians to feel safer and have more confidence in the effectiveness of the Government response to DFSV.
- Commit to undertaking stakeholder and service user engagement as part of all evaluation processes.
- Consider additional, local data sources that accurately reflect the NT context. While the NCAS is an important source and good starting point, its sample for the NT is small and the proportion of First Nations survey respondents low.
- Work closely with ANROWS to ensure best use of NCAS data – including consideration of timeseries, changes to methodology and sample.

NTCOSS notes that strong governance is identified as critical within the Framework but is concerned about the lack of transparency regarding governance arrangements and particularly the failure to identify how Aboriginal governance will be embedded.

Opportunities to strengthen the governance of this Framework:

- Establish a NT DFSV sector advisory group, at Ministerial and Departmental levels that adheres to Closing the Gap, Priority Reform One- Formal Partnerships and Shared Decision Making.
- Consider including ACCO family violence legal services as members of the Aboriginal Advisory Board.
- Ensure advisory boards and working groups are designed to facilitate collaboration- not duplication- and are considerate of the stretched capacity of the Sector.
- Ensure governance arrangement are inclusive of all regions of the NT.

- Clearly identify and resource permanent primary prevention governance and reporting mechanisms distinct from DFSV response mechanisms.

NTCOSS notes that a sound systems logic is critical in effectively evaluating initiatives. However, many of the indicators in the data matrix are currently listed as ‘to be determined’. Establishing the baseline measures and clear targets early would enhance the framework’s clarity.

Opportunities to improve the impact of the roadmap’s Program Logic and Data Matrix:

- Consider adding indicators that capture system-level collaboration (e.g., information sharing, cross-agency referrals and integrated service pathways).
- Focus on indicators that measure outcomes rather than output to better reflect the goals in the program logic.
- Provide clarity about the availability and frequency of data reporting.
- Include data on long-term outcome indicators such as DFV homicides and victimisation rates.

3. Other considerations

Sexual Violence

Sexual violence is not recognised as a distinct issue within the Framework, despite it being a significant issue in the NT. We welcome initiative 24- to establish Aboriginal-led, community based sexual assault services. However, due to the demand for specialist sexual violence services across the NT, it needs significantly increased resourcing throughout the NT.

NT Regional Focus

Domestic, Family and Sexual Violence is a significant issue across the entire NT. NTCOSS recommends that the roadmap takes into consideration the diverse needs of Territorians living out of Darwin and Alice Springs by including a breakdown of investment, initiatives and programs being supported in each NT region.

Yours sincerely,

Sally Sievers
CEO NTCOSS

