



3 December 2025

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

Via email: [dfv@nt.gov.au](mailto:dfv@nt.gov.au);

To the Domestic, Family and Sexual Violence Prevention Division,

**RE: Domestic, Family and Sexual Violence (DFSV) Training and Resource Centre**

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. NTCOSS facilitate a territory-wide DFSV network, which includes over 30 NTCOSS member DFSV services. This network supports the coordination and advocacy within the NT DFSV sector.

NTCOSS acknowledge that we live and work on what always was, and always will be, Aboriginal land. We pay our respects to Aboriginal cultures and country, and to Elders both past and present. We acknowledge the courage and dignity of those who stand up and say no to violence, and the DFSV knowledge and learning provided to us by Aboriginal people we work and live with in our communities. NTCOSS also recognise the diversity of the Northern Territory, where nearly one-third of Territorians come from multicultural and refugee backgrounds<sup>1</sup>. Cultural safety must therefore be understood as encompassing both Aboriginal and multicultural worldviews, histories, and experiences.

Thank you for considering our input below regarding the *NT DFSV Training and Resource Centre- Consultation Paper* (the Consultation Paper). Many of the Sector have made their own submissions regarding the Consultation Paper and several are co-signatories here.

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<sup>1</sup> NTG Multicultural Strategy Consultation Paper (2025)

NTCOSS supports the establishment of a fully funded DFSV Training and Resource Centre to strengthen workforce capability and improve the quality and consistency of DFSV responses across the Northern Territory. To be effective, the Training and Resource Centre must prioritise the needs and realities of regional and remote communities, ensuring training is accessible, culturally safe, and responsive to local contexts. Training must be aligned with the National Agreement on Closing the Gap and include legislatively informed content to prevent criminalisation arising from misunderstandings of coercive control, DVO processes, child protection laws and mandatory reporting. The Centre must also meaningfully include multicultural expertise and ensure that migrant and refugee experiences are considered.

NTCOSS also recommends that service-based trainer roles be retained to preserve practical, sector-informed delivery, and that independent advocacy functions—such as those currently held by NTCOSS and AMSANT—be maintained to ensure the sector continues to have a strong, independent voice informing policy, program, and system reform.

The following key areas are discussed in detail within this submission:

1. Regional and Remote Priorities
2. Risks of Fee-for-Service Model
3. Retain Service-Based Trainers
4. Multicultural and Refugee Inclusion
5. Protect Independent Advocacy Roles

## 1. Regional and Remote Priorities

***Prioritise regional and remote access to ensure training and capability initiatives are responsive to the context, workforce challenges, and community needs across the NT.***

Over 95 per cent of the Northern Territory is classified as remote or very remote, with around 85–90 per cent of the population living outside inner regional areas<sup>2</sup>. This reality shapes the vast and diverse locations where DFSV services and programs are delivered, with some staff needing to undertake multi-hour drives or even plane trips to reach regional centres for training. It is therefore essential that logistical and practical support is carefully considered when planning training in remote areas. These arrangements must be developed in collaboration with remote communities to ensure that training is relevant, accessible, and culturally safe within the context in which it is delivered.

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<sup>2</sup> Department of Treasury and Finance; Australian Bureau of Statistics <https://nteconomy.nt.gov.au/fast-facts/population>

Training and resource support must be available in multiple formats. Reliance on video or online training alone is often impractical, as internet connectivity in remote areas is unreliable, which reduces engagement and limits learning outcomes. Workforce capability initiatives must also account for limited infrastructure, high staff turnover, and smaller workforce pools in remote communities.

The following is extracted from the 2023 consultation NTCOSS completed regarding the development of a DFSV training and resource centre:

1. *The logistical difficulties of delivering training to remote organisations:*
  - a. *Using fly-in/fly-out trainers is an expensive model and can be further hindered by limited accommodation options in remote communities or interrupted by cultural obligations or illnesses.*
  - b. *Small remote organisations cannot afford to send their staff to attend training in Darwin or Alice Springs. Further, this approach draws workers out of services, leaving the service understaffed or even unable to operate.*
  - c. *Online delivery is often unsuitable. The internet in remote communities is unreliable. Remote-based participants may have English as their second (or fifth) language. A patchy internet connection makes it even more difficult to hear and understand what the trainer is saying and engage in discussion.*
  
2. *Training must be accessible for participants, considering their language and literacy abilities. Receiving training in a third or fourth language is challenging, particularly when the content is complicated and heavy. If proceeding with the current proposed model of centrally based trainers, trainers delivering training in remote communities should engage a local co-facilitator and an interpreter at a minimum.*<sup>3</sup>

Remote organisations proposed the following models as the best ways to deliver training in remote communities, in order of preference:

1. *'Train the trainer' program whereby the Resource Centre trains local people living in remote communities to deliver training to organisations in their community. It was identified that this would:*
  - a. *Address the fly-in/fly-out costs and ensure the training delivered within each community is appropriate and specific to each community.*
  - b. *Bring additional benefits of strengthening the remote and Aboriginal workforce.*
  - c. *Support remote-based trainers to stay connected to the Resource Centre and other trainers through communities of practice and receive ongoing professional development.*

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<sup>3</sup> Northern Territory Council of Social Service (NTCOSS) DFSV Resource Centre Consultation Report 2023

*Fly-in/fly-out model whereby trainers travel to communities and stay for periods of one week or longer and deliver multiple training modules in one trip. This will save on costs, capture the most participants across services and allow reflection on the interconnected nature of the various modules. Stakeholders emphasised the importance of allowing staff to come and go from training to enable them to meet ongoing service needs. In this model, it was identified as vital that trainers engage local co-facilitators and interpreters and work with communities beforehand to ensure the training is appropriate and safe.*<sup>4</sup>:

## 2. Risks of the Fee-for-Service Model

***A fee-for-service model may create barriers for smaller or regional organisations and limit equitable access to training and support.***

Introducing a fee-for-service model for DFSV training carries significant risks, particularly for smaller NGOs and Aboriginal Community Controlled Organisations (ACCOs) that operate with limited funding and tight budgets. Such a model could unintentionally exclude these organisations from essential workforce development opportunities, undermining their capacity to deliver safe, high-quality services. It may also deepen existing inequities across the sector, privileging better-resourced organisations while leaving those in remote or underfunded regions without access to necessary training and support.

At the same time, NTCOSS members have expressed concerns regarding the perceived “value” of training when it is provided at no cost. Services have noted that free training can lead to lower commitment and higher rates of non-attendance, reducing the effectiveness of delivery and limiting opportunities for those who genuinely wish to participate. These attendance issues also have practical impacts, including wasted preparation, disrupted planning, and reduced continuity across training cohorts.

To balance these competing risks, members have proposed introducing a modest training fee to reinforce the value of the program and encourage consistent attendance. Importantly, this would be paired with a structured fee-waiver system for organisations without the financial capacity to pay, such as rural and remote services, ACCOs, and smaller NGOs. A waiver model would maintain equitable access while still supporting a culture of accountability and commitment across the sector.

Ultimately, preventing inequities will require the DFSV Training and Resource Centre to be adequately funded to meet its mandate without reliance on a fee-for-service model. Appropriate and sustainable funding would ensure that training remains accessible across the NT, particularly for organisations operating in remote and regional areas, and would remove financial barriers that currently limit participation. With adequate resourcing, the Training and Resource Centre can strengthen workforce capability,

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<sup>4</sup> Northern Territory Council of Social Service (NTCOSS) DFSV Resource Centre Consultation Report 2023

support consistent sector-wide practice, and ensure frontline services are well-equipped to respond to the diverse needs of NT communities.

### 3. Retain Service-Based Trainers

***Maintain service-based trainer roles to preserve practical, sector-informed delivery and ensure training remains grounded in frontline experience.***

Service-based trainers are essential to maintaining the relevance and quality of the DFSV workforce development in the Northern Territory. Trainers who are embedded in service delivery bring a deep understanding of real-world practice and the complexity of delivering services across diverse regional and remote contexts. Their firsthand experience ensures that training content reflects the realities faced by frontline workers, including issues of cultural safety, trauma-informed practice, and community engagement. This should include Aboriginal trainers with trusted community knowledge and cultural authority, local facilitators who understand kinship, language and community relationships and legal practitioners familiar with the NT's legislative frameworks.

### 4. Multicultural and Refugee Inclusion

***The NT's multicultural and refugee population make up nearly one-third of the Territory. Yet their experiences are effectively invisible in DFSV policy, data systems, and the current Training and Resource Centre proposal.***

Multicultural and refugee communities make up nearly one-third of the Northern Territory's population, yet their experiences are largely invisible across DFSV policy, data systems, and the current Training and Resource Centre proposal. While the strong emphasis on Aboriginal cultural safety is essential and must remain central, it unintentionally eclipses the realities and needs of migrant and refugee families, who face distinct forms of risk linked to migration pathways, language barriers, intergenerational conflict, and settlement stress.

National evidence demonstrates that migrant and refugee women experience disproportionately high rates of coercion, control, and threats linked to visa status, and that disclosure is far less likely to occur within mainstream systems, instead happening only within trusted, culturally familiar environments.

Frontline workers, therefore, require specific competencies to engage safely and effectively with these communities, including understanding migration-related coercion and visa-linked abuse, trauma histories, interpreter engagement, multilingual communication, and the cultural stigma that often prevents disclosure. The absence of a multicultural specialist DFSV provider in the Northern Territory exacerbates these gaps. The proposed Training and Resource Centre, therefore, requires genuine multicultural representation in governance, co-design, and training delivery.

## 5. Protect Independent Advocacy & Collaboration/Coordination Roles

***Maintain independent advocacy functions (e.g. NTCOSS and AMSANT Senior Policy Officer roles); these roles should not be absorbed into the training centre without significant expansion of scope to include systemic advocacy and sector collaboration and feedback mechanisms.***

Independent advocacy roles, including Senior Policy Officer Roles held by NTCOSS and AMSANT, are critical to ensuring that the DFSV sector retains a strong and independent voice. These positions provide essential feedback mechanisms between the sector and government both NT and Federal, enabling policy, program, and system-level decisions to be informed by on-the-ground experience and evidence from frontline services.

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)<sup>5</sup>. A dedicated peak body would have mechanisms to collect sector perspectives across the Territory, including those of NGOs and ACCOs, represent its needs and challenges, support the workforce, and ensure that the voices of victim-survivors are heard.

It is therefore essential that these advocacy and coordination roles are not absorbed into a training centre or other government-funded body without a significant expansion of mandate and guaranteed independence. Doing so risks weakening the sector's ability to provide frank, evidence-based advice or to raise concerns about system gaps and performance. Maintaining independent advocacy ensures that the government receives unfiltered input and supports transparency and accountability in system reform.

A clear distinction between service delivery, workforce development, and systemic advocacy & coordination is crucial for a balanced and effective DFSV service system. Each plays a unique and complementary role in improving safety, well-being, and justice outcomes. Preserving independent advocacy functions allows the sector to continue influencing reform, amplifying community voices, and driving continuous improvement across the system.

### Conclusion

The establishment of a DFSV Training and Resource Centre represents a critical opportunity to strengthen the capability, cultural safety and consistency of responses across the Northern Territory. To succeed, the Centre must be fully funded, grounded in Aboriginal leadership and community control, and designed in genuine partnership with

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<sup>5</sup> Inquests into the deaths of Miss Yunupinju, Ngeygo Ragurrk, Kumarn Rubuntja and Kumanjayi Haywood [2024] NTLC 14

the diverse communities it seeks to serve, including the Territory's significant multicultural and refugee populations.

An effective TRC must respond to the realities of remote and very remote service delivery, embed legislative and legal literacy, and avoid reproducing mainstream models that risk misidentification, inequity and the exclusion of both Aboriginal and multicultural voices. Maintaining service-based trainers and independent advocacy roles—such as those held by NTCOSS, AMSANT—is essential to ensuring that lived experience, frontline knowledge, community expertise and systemic accountability remain at the centre of workforce development and policy reform.

With genuine collaboration, equitable access, and culturally informed design, the TRC can become a transformative mechanism that strengthens safety, supports healing, and improves outcomes for all individuals, families and communities across the Northern Territory.

Yours sincerely,



Sally Sievers

CEO

NTCOSS

