



19 December 2025

Office for Gender Equity
Department of People, Sport and Culture
Northern Territory Government
Via email to: dpsc.oged@nt.gov.au

To the Department of People, Sport and Culture,

Re: Submission to the Development of the Gender Equality Strategy

The Northern Territory Council of Social Services (NTCOSS) welcomes the opportunity to provide a submission to the development of the Gender Equality Strategy (the Strategy) for the Northern Territory (NT).

NTCOSS is the peak body for the NT community and social services sector and is a voice for people affected by social and economic disadvantage and inequality. NTCOSS 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 represents members across the NT, including Domestic, Family and Sexual Violence (DFS) specialist services and other community services that disproportionately engage with women and their children.

As outlined in the consultation document, gender-based violence, pay inequity, inequitable access to health care and essential services, and reduced participation in education and employment disproportionately affect women¹ and gender-diverse people in the NT^{2,3}. These inequalities are intensified by intersecting factors such as poverty, Aboriginality, geographic isolation, disability, immigration status and sexual orientation.

Given the intersectional nature of gender inequality, NTCOSS strongly recommends that the NT Government adopt a Gender Equity Strategy, rather than a Gender Equality Strategy. Prioritising equity ensures that structural disadvantage such as remoteness, poverty, discrimination and historic underinvestment can be addressed so that all people, particularly women and gender-diverse people in marginalised communities, can thrive.

¹ For the purpose of this paper, we assume statistical equivalence for all data collected for Sex for Gender. We note that Sex and Gender are different.

² Workplace Gender Equality Agency, *Gender Pay Gap Data*, (Commonwealth Government 2025), <https://www.wgea.gov.au/pay-and-gender/>

³ LGBTQI+ Health Australia. *Where to from here: An Approach to Ending Gender Based Violence in LGBTQI+ Communities*. (2025). <https://assets.nationbuilder.com/lgbtihealth/pages/6479>



This approach is more pragmatic, justice-focused, and aligned with the NT's political realities.

NTCOSS does not support replacing a formal Action Plan with broad, high-level actions under each focus area. The Strategy must include clear, tangible, measurable actions that enable meaningful implementation and accountability.

Below, NTCOSS provides feedback on focus areas most relevant to the community and social services sector.

Focus Areas 1 and 2: Community Engagement & Health and Wellbeing:

Meeting basic needs such as access to affordable and reliable energy, sufficient and nutritious food, and safe, secure housing, is foundational to active participation in community life and improve health and wellbeing. The NT has the highest rates of disadvantage in Australia. Despite continued advocacy over the past decade, the gap between women and men experiencing poverty has widened.⁴ One in two women in the NT are on low incomes⁵ and women make up the majority of income support payment recipients.

Improving access to basic needs is one of the highest-impact interventions available to the NT Government to support community participation and wellbeing for women and their families. This should be done in line with Closing the Gap targets.

Opportunities

1. Invest in affordable and appropriate housing

Safe, affordable, and secure housing is foundational to wellbeing. Territorians are 12 times more likely to experience homelessness than Australians elsewhere. Women in the NT are more likely than men to be homeless⁶. The main driver of homelessness for women is domestic and family violence and in the NT 56% of clients presenting to homelessness services present due to DFV.⁷ In 2021 there were more than 9,500 women experiencing

⁴ UN Women. *The Feminization of Poverty*, Accessed at <https://www.un.org/womenwatch/daw/followup/session/presskit/fs1.htm>

⁵ Low income is defined as less than \$650 personal income a week. Data collected through Census, 2021 and analysed by NTCOSS

⁶ NTCOSS analysis via Census, 2021

⁷ Australian Institute of Health and Welfare, *Specialist Homelessness Services Annual Report 2022-23*, <https://www.aihw.gov.au/reports/homelessness-services/specialist-homelessness-services-annual-report/contents/state-and-territory-summary-data-and-fact-sheets>



homelessness. Women are also more likely to live in severely overcrowded dwellings and are more likely to be in rental stress than men.

NTCOSS recommends:

1. Complete the third tranche of amendments to the *Residential Tenancies Act 1999 (NT)* to ensure renters have protections comparable with other jurisdictions, including:
 - *Establishing an independent Residential Tenancies Bond Board*
 - *Introducing minimum rental housing standards, including energy efficiency*
2. Adopt a Mandatory Inclusionary Zoning policy ensuring at least 30% of Crown land released for residential development is allocated to social and affordable housing.
3. Introduce a new rental affordability scheme to replace the expiring National Rental Affordability Scheme (NRAS).

2. Energy

Access to reliable and affordable energy is a basic need. Yet many households in the Northern Territory - particularly in remote and very remote communities - cannot afford the power they need for safe, healthy, and comfortable living. Women in the NT experience higher rates of chronic disease, placing them at greater risk when energy access is compromised. Women in the NT are 12% more likely to have one or more long term health condition than men and 24% more likely to have three or more long term health conditions than their male counterparts⁸. The convergence of poverty, extreme heat, poor housing, overcrowding and chronic disease has reached critical levels and requires immediate action as people are unable to adequately cool their homes and refrigerate medicines.

NTCOSS Recommends:

4. Adopt mandatory electricity disconnection reporting for prepayment meters as well as post payment metres through the Electrical Industry Performance Code.
5. Ensure disconnection protections for people with chronic disease.

⁸ NTCOSS analysis via Census, 2021



6. Adopt the National Construction Code 2022 7-star energy efficiency standard for all new housing under the National Partnership Agreement on Remote Housing NT.
7. Support low-income households to replace inefficient appliances and fittings.

Focus Area 3: Safety

The NT experiences the worst rates of domestic, family and sexual violence (DFSV) in the country and women, especially Aboriginal and Torres Strait Islander women and families, are disproportionately impacted by this violence. DFSV intersects with other structural disadvantage experienced by women, Aboriginal Territorians and gender diverse people such as disability, migrant or refugee status and has a profound impact on NT communities.

‘Safety’ from DFSV must include physical, psychological, and emotional safety for women and children, families, communities, and employees. Culturally informed, trauma integrated healing approaches to working alongside Aboriginal people also highlight that ‘safety’ and creating safe organisations and services is not just physical, it also requires a commitment to ensuring psychological, and emotional safety, and it is about prioritising safety for clients, whole communities, and all employees.⁹

Opportunities:

1. Prevention of Gender-Based Violence

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

⁹ Ranjbar N, Erb M, Mohammad O, Moreno FA. (2020). *Trauma-Informed Care and Cultural Humility in the Mental Health Care of People From Minoritised Communities*.
<https://pmc.ncbi.nlm.nih.gov/articles/PMC7011220/>.



NTCOSS recommends:

8. 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.¹⁰
9. Prioritise long-term investment in prevention activities which address the drivers of violence against women, with particular focus on the drivers of violence against women from migrant and refugee backgrounds and women with a disability.^{11 12}
10. Adequately fund Respectful Relationships Education (RRE) to ensure a comprehensive approach to RRE is accessible for all schools across the Northern Territory, including through ongoing and long-term investment.
11. Ensure adequate access to programs that are culturally and linguistically appropriate, particularly in DFSV, mental health and housing services.¹³
12. Ensure primary prevention is included in all community and social services sector development activities.¹⁴
13. Embed intersectionality as a core principle in prevention initiatives.
14. Support LGBTQIA+ people to access culturally safe and trauma informed family, domestic, and sexual violence support services , as recommended in [National Action Plan for the Health and Wellbeing of LGBTQIA People 2025-2045](#)¹⁵

¹⁰ Our Watch, *Changing the picture: A national resource to support the prevention of violence against Aboriginal and Torres Strait Islander women and their children*, <https://assets.ourwatch.org.au/assets/Key-frameworks/Changing-the-picture-AA.pdf>

¹¹ Our Watch, *Changing the landscape: A national resource to prevent violence against women and girls with disabilities* <https://www.ourwatch.org.au/change-the-story/changing-the-landscape>

¹² Our Watch, *Preventing violence against women from migrant and refugee backgrounds* <https://www.ourwatch.org.au/preventing-violence/migrant-and-refugee-women>

¹³ Our Watch, *Preventing violence against women from migrant and refugee backgrounds* <https://www.ourwatch.org.au/preventing-violence/migrant-and-refugee-women>

¹⁴ Our Watch, *Change the story: A shared framework for primary prevention of violence against women in Australia (2nd Edition)*, <https://assets.ourwatch.org.au/assets/Key-frameworks/Change-the-story-Our-Watch-AA.pdf>

¹⁵ Department of Health and Aged Care, [National Action Plan for the Health and Wellbeing of LGBTQIA+ People 2025-2035](#), Page 42



2. Workforce development and training

The NT workforce must be equipped to deliver safe, inclusive and trauma-integrated services. Considerable investment is required to ensure services are affirming and accessible for gender-diverse people; culturally safe and secure, and to ensure the safety of everyone intersecting with DFSV.¹⁶

Alongside capability and training, there must be a stronger focus on workforce wellbeing, safety and sustainability. In particular, the social and community sector are routinely exposed to vicarious trauma, high workloads and complex risk environments, which can lead to burnout, high turnover and workforce shortages if left unaddressed.

NTCOSS recommends:

15. Provide cultural safety, security, and competency training for the human services sector, that recognises the on-going impacts of colonisation and trauma on First Nations people and communities.
16. Equip employers and the workforce with skills to ensure safe, inclusive, non-exploitative workplaces for multicultural employees. This should include targeted training for workplaces in remote areas:
 - Ongoing cultural humility and competency training for staff and leadership
 - Resourcing from the NT Government for workplaces to implement inclusion programs, translate essential information and adapt recruitment practices
 - Targeted training for workplaces in remote areas where there are no multicultural or migrant services
17. Provide anti-discrimination workplace training (in particular, embed positive duty) to equip employers and their workforce with up-to-date information on their role and responsibilities in addressing discrimination in the workplace and broader community.

¹⁶Recommendation 3: Workforce planning, in *Inquest into the deaths of Miss Yunupinu, Ngeygo Ragurk, Kumarn Rubuntja and Kumanjayi Haywood*: The Northern Territory Coroner. *Inquests into the deaths of Miss Yunupinu, Ngeygo Ragurk, Kumarn Rubuntja and Kumanjayi Haywood* (Coroners Court 2024), 231, <https://agd.nt.gov.au/media/docs/inquest-finding-publications/2024/74c7ad06daceae11bd2c0534cdc274fe6e61b06e.pdf>



Training should be targeted at industries and organisations employing or engaging large cohorts of newly arrived migrants and on visas reliant on government grants.

18. Ensure that appropriate orientation courses and training opportunities, with inclusion of DFSV training, are readily available to ensure that staff being recruited to regional, remote and very remote areas are resourced for early successes in their jobs¹⁷.
19. Provide support for organisations to understand the scope of trauma exposure for staff to effectively implement hazard control measures.
20. Provide adequate resourcing for organisations to set up employment models and program design that support effective two-way learning, practice and ways of seeing¹⁸ with the recognition that genuine collaboration between First Nations and mainstream or Western knowledges, can result in unique insights, practices and programs.¹⁹

3. Monitoring and evaluation

Consistent, ethical and culturally safe data collection and evaluation are essential to improving DFSV policy and service responses. An understanding of the scale of the problem, the capacity of the sector to respond, and the efficacy of the responses enables the delivery of more targeted funding and more effective policies. All monitoring and evaluation frameworks must respect lived experience, support Indigenous data sovereignty, and ensure findings are used to improve outcomes for communities.

NTCOSS recommends:

21. Align the NT Gender Equality Strategy's monitoring and evaluation with national frameworks which follow best practice principles for evaluation, such as [AIATSIS Code of Ethics](#), the [Australian Evaluation Society First Nations Cultural Safety Framework](#), and the [Productivity Commission Indigenous Evaluation Strategy](#). This includes:

¹⁷ This should include consistent, safety focused, non-collusive, culturally informed, trauma-integrated healing approaches to DFSV. Workers should receive explicit instruction protocols for handling emergency safety situations that might occur in a remote community.

¹⁹ Brown, C., Campbell, S., Simpson, C., & Corbo, M. (2024). Two-Way Learning: A Model for Decolonising Feminist Leadership and Advocacy. *Social and Health Sciences*, 22(1), <https://doi.org/10.25159/2957-3645/11833>.



- Engaging people with lived expertise²⁰
- Ethical and trauma-informed practice²¹
- Decolonising, culturally safe and First Nations evaluation approaches²²
- Indigenous data sovereignty²³
- Co-design and participatory approaches²⁴
- Address data gaps through increasing funding and investing in infrastructure for service providers to improve their data capabilities.
- Commit to making all forms of evaluation publicly accessible

Focus Area 4: Economic security

Economic security means having a stable and adequate income, access to essential services, and the capacity to meet basic needs such as housing, energy, food and transport, without ongoing financial stress. In the NT, many Territorian's experience barriers to economic security, with women disproportionately affected by insecure work, unpaid care responsibilities²⁵ and lower incomes²⁶.

Older women are particularly affected, with approximately 25 per cent of women aged 60 and over living in poverty across Australia. The long-term consequences of this gendered financial insecurity include women having reduced superannuation, and increased reliance on partners, family members or social security. When circumstances change, such as relationship breakdown, family violence or becoming a sole parent, women can experience sudden and severe financial insecurity.

While Australia's social security system largely lies in the Australian Government's remit, the NT Government plays a critical role in strengthening women's economic security through complementary policy settings. Concession schemes, cost-of-living supports,

²⁰ Productivity Commission. *Indigenous Evaluation Strategy*. (Commonwealth of Australia, 2020),5,6,11, <https://www.pc.gov.au/inquiries-and-research/indigenous-evaluation/strategy>

²¹ The Productivity Commission, *Indigenous Evaluation Strategy (Australian Commonwealth 2020)*, 16,17, <https://assets.pc.gov.au/inquiries/completed/indigenous-evaluation/draft/indigenous-evaluation-draft.pdf>.

²² Gollan, S & Stacey, K. *First Nations Cultural Safety Framework* (Australian Evaluation Society, 2021), 13, https://www.aes.asn.au/images/AES_FirstNations_Cultural_Framework_finalWEB_final.pdf?

²³ Australian Institute of Aboriginal and Torres Strait Islander Studies (AIATSIS). *AIATSIS Code of Ethics for Aboriginal and Torres Strait Islander Research* (AIATSIS 2020), 18, <http://aiatsis.gov.au/ethics>.

²⁴ Gollan, S & Stacey, K. *First Nations Cultural Safety Framework* (Australian Evaluation Society, 2021), 12, https://www.aes.asn.au/images/AES_FirstNations_Cultural_Framework_finalWEB_final.pdf?

²⁵ Census (2021) data highlights that women are 32% more likely to undertake unpaid childcare and are more than twice as likely to complete over 15 hours of unpaid domestic work than men.

²⁶ Census (2021) data shows that women in the NT have significantly lower median weekly incomes than men, with one in two women classified as low-income earners.



access to affordable services, transport, housing and workforce participation measures all sit within NT Government influence and can significantly mitigate poverty and financial stress for women and their children.

The opportunities

1. Investment in Concession Schemes

Australia's social security system is designed to ensure a "minimum adequate standard of living," including access to adequate food, water, housing, and essential services. Whilst the Australian Government hold the policy levers regarding payment adequacy, the NT Government has a role to play in ensuring people experiencing poverty - particularly women, sole parents, and people living in remote areas have access to their basic needs.

NTCOSS recommends:

22. Expanding eligibility of the concession scheme to all Health Care Card holders and other excluded low-income groups.

2. Cost of Living

Targeted interventions to reduce cost-of-living pressures are essential to achieve gender equity. Concession schemes, affordable transport, and accessible public and community services play a critical role in alleviating poverty - particularly for women who often bear the financial brunt of providing for families.

NTCOSS recommends:

23. Reform the NT concession scheme to better relieve cost-of-living pressures by:

- *Expanding eligibility to all Health Care Card holders and other excluded low-income groups*
- *Increasing NT Motor Vehicle Concessions and introducing annual indexation*
- *Improving administration to ensure eligible people can remain in the Scheme*

24. Require private transport providers receiving NT government funding to offer significant concession fares. Undertake a review of regional and remote transport options to address major gaps and reduce reliance on costly private transport.



3. Reduce barriers for women entering and remaining in the workforce

Reducing the barriers to entering, remaining in, and re-entering the workforce for mothers is critical to achieving gender equity. Employment rates in the NT are particularly low for single mothers and poverty rates are highest for single mothers.

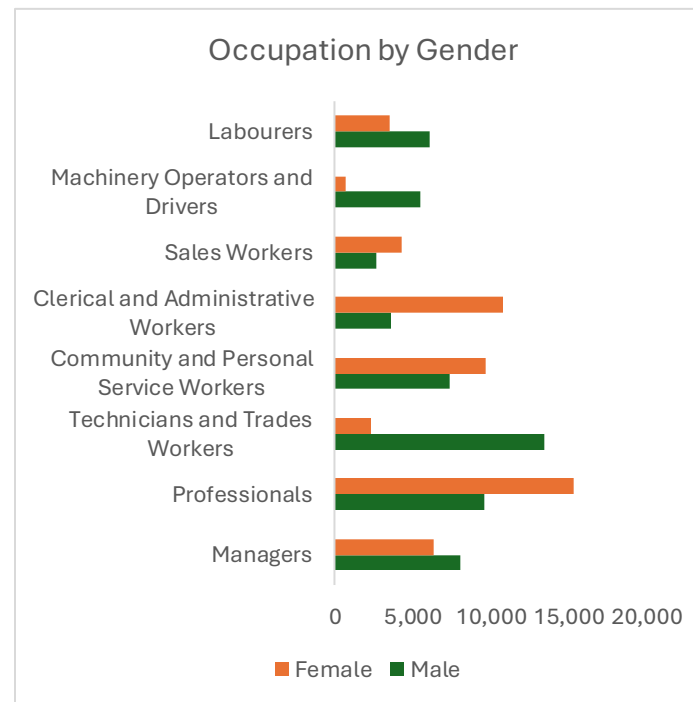
NTCOSS recommends:

25. Improve access to childcare, particularly in remote areas.

Focus Area 5: Leadership

NT occupations remain highly gendered. Women dominate lower-paid care and social service roles and remain underrepresented in senior leadership. According to the Census, in the NT men account for 63% CEOs and 89% Machinery Operators and Drivers, whilst women account for 76% of carers and Aids, 61% of Health and Welfare Support Workers and 60% of Community and Personal Service Workers²⁷. Nearly one in five (18%) female employees in the NT are employed as Community and Personal Service workers²⁸, a sector that remains undervalued despite their critical social function.

Providing opportunities for women to be leaders requires governments, and society more broadly to place a greater value on female dominated occupations.



The opportunities

1. Greater valuation of the social and community services sector

The NT social and community services sector underpins care, wellbeing and social cohesion. Yet short-term funding, rising demand, and workforce shortages threaten

²⁷ NTCOSS analysis via Census, 2021

²⁸ NTCOSS analysis via Census, 2021



stability and outcomes. These issues disproportionately impact women due to the gendered nature of the workforce.

NTCOSS recommends:

- 26. Remove efficiency dividends for social and community service sector grant funding.
- 27. Uplift grant funding over three years to restore funding to 2018 levels in real terms.
- 28. Adjust the grant indexation formula to reflect sector-specific cost pressures, including wages, housing, and travel costs.
- 29. Fund development of an independent, credible set of definitions and data on indirect and operational costs for NGOs, with reference to delivery in remote and very remote areas.

2. Gender responsive budgeting

NTCOSS recommends that the NT Government adopt gender-responsive budgeting principles across all budget processes to ensure public investment addresses gendered inequities and delivers equitable outcomes.

Thank you for considering our submission. Please contact ceo@ntcoss.org.au for further information.

Yours sincerely,

Sally Sievers AO

CEO NTCOSS