

31 July 2026

Department of Social Services
71 Athllon Drive
GREENWAY ACT 2900

Submission on Second Action Plan under Australia's National Plan to End Violence against Women and Children 2022-2032

Introduction

Thank you for the opportunity to provide this submission on the Second Action Plan under Australia's National Plan to End Violence against Women and Children 2022-2032 (**Second Action Plan**).

This submission considers four out of the five priorities areas identified in the consultation paper to support this review. CAWLS is not in a position to comment on Priority Action 4 as our service focusses on women and victim-survivors. This does not take away from the importance of addressing users of violence or the need for their inclusion in the Second Action Plan.

About Us

Central Australia Women's Legal Service (**CAWLS**) is a trauma-informed community legal centre for women in the Central Australia and Barkly regions of the Northern Territory. Approximately 75% of CAWLS clients are Aboriginal women. CAWLS delivers legal advice and representation, client support, financial counselling, domestic and family violence court support, criminal duty lawyer services, a family law practice, a child protection practice, community legal education and extensive outreach to remote communities. Recognising that legal issues are often interconnected with housing, financial security, safety and wellbeing, CAWLS takes a holistic approach and provides wrap-around services that support women beyond legal representation alone.

Executive Summary

The Second Action Plan should recognise Aboriginal and Torres Strait Islander and immigrant and refugee women as priority groups (Recommendation 1). CAWLS makes 27 recommendations to better support victim survivors in these cohorts and the sector more broadly. To support immigrant and refugee women, CAWLS recommends the expansion of the Family Violence Provisions (Recommendations 2 - 3) and the



CAWLS is funded by the Australian Government Attorney-General's Department, the National Indigenous Australians Agency & the Northern Territory Government

introduction of a new family violence visa category (Recommendation 5). To support Aboriginal and Torres Strait Islander women, CAWLS recommends that the Integrated Community Justice Partnership program be extended and a program be introduced to support non-specialist services responses to domestic and family violence (DFV) in remote communities (Recommendations 6 - 7). An accreditation program should be introduced to uplift Aboriginal Community Controlled Organisations' capability in responding to DFV (Recommendation 8). Additional funding should also be provided to all community legal centres in Central Australia and the Barkly to support victim survivors (Recommendation 4).

Housing scarcity and inadequacy can exacerbate DFV. To address this as a driver of DFV, the Second Action Plan should consider investment in public housing and transitional housing (Recommendations 9 - 11). The Second Action Plan should introduce a school lawyer program to provide education on healthy relationships and gendered violence and support young people in their own right (Recommendation 12). A dedicated child protection client support worker should also be embedded into DFV specialist services to support reunifications (Recommendation 13).

The Federal Circuit and Family Court of Australia's Lighthouse program should consider dynamic risk assessments, be expanded into regional areas and be made accessible to Aboriginal and Torres Strait Islander people (Recommendations 14 – 21). Police responses to DFV still remain inadequate. There is need to recruit more officers, provide specialised training, evaluate existing programs and ensure laws recognise misidentification (Recommendations 23 - 26). Finally, the Second Action Plan must ensure specialist legal services are provided with sustainable long-term funding to ensure they are able to meet demand (Recommendation 27).

Recommendations

- **Recommendation 1:** The Second Action Plan identifies Aboriginal and Torres Strait Islander and immigrant and refugee women and girls as priority groups of victim-survivors
- **Recommendation 2:** Family Violence Provisions are extended to encompass family and close personal relationships beyond intimate partner relationships
- **Recommendation 3:** Lowering evidentiary requirements for establishing a 'genuine' relationship and the presence of DFV to make the Family Violence Provisions more accessible to victim survivors
- **Recommendation 4:** Additional funding is provided to all community legal centres providing services in Central Australia and the Barkly
- **Recommendation 5:** Introduce a new substantive family violence visa for those on temporary visas not captured by the Family Violence Provisions, drawing from models in New Zealand and Canada

- **Recommendation 6:** The Integrated Community Justice Partnership program be extended beyond its initial pilot and extended into the Barkly region
- **Recommendation 7:** A program should be introduced to support non-specialist providers responding to DFV by adopting a partnership model with specialist DFV services like the Local Link project,
- **Recommendation 8:** An accreditation program is implemented to recognise specialist services that uplift, and work in partnership, with Aboriginal Community Controlled Organisations to deliver services to Aboriginal communities.
- **Recommendation 9:** Construct, repair and maintain public housing in remote Aboriginal communities.
- **Recommendation 10:** Ensure all public housing has access to air conditioning, particularly, in remote Aboriginal communities in the NT
- **Recommendation 11:** Construct medium to long term housing (such as transitional housing) for women experiencing DFV in the Northern Territory.
- **Recommendation 12:** Provide a school lawyer program to reach young people and provide education on gendered violence and healthy relationships.
- **Recommendation 13:** Dedicated child protection client support workers should be embedded into all DFV specialist services in the NT
- **Recommendation 14:** The Lighthouse program should be expanded to include property matters and be offered in Alice Springs and other circuit court jurisdictions.
- **Recommendation 15:** The Family DOORS Triage Questionnaire should be made available in all required languages including First Nation's languages.
- **Recommendation 16:** The Family DOORS Triage Questionnaire should not be a one-off risk assessment but a dynamic risk assessment which occurs across the life of a matter.
- **Recommendation 17:** Cultural Liaison Officers and Disability Liaison Officers should be expanded to Alice Springs and other circuit court jurisdictions.
- **Recommendation 18:** A physical FCFCOA registry should be established in Alice Springs to support victim-survivors access to justice
- **Recommendation 19:** Court Child Experts should be funded to travel to remote Aboriginal Communities
- **Recommendation 20:** The FCFCOA should build relationships with remote public health services to facilitate remote appearances, interviews and observations with CCEs.
- **Recommendation 21:** Where FCFCOA registries are co-located in Local Courts, such as the case in Alice Springs, funding should be allocated to facilitate electronic viewing of read only material.

- **Recommendation 22:** Department of Social Services should provide ongoing funding to DFV Financial Counsellors in all specialist DFV legal services across Australia to address financial abuse and support women leaving violence
- **Recommendation 23:** NT Police need to recruit, train and retain staff, especially in remote communities to be able to meet demand.
- **Recommendation 24:** Scale the Prevent Assist Respond Training (PART) program to ensure all police officers receive the specialised training they need to respond to DFV as soon as possible
- **Recommendation 25:** Evaluate the Co-responder program and Family Harm Coordination Daily Audit to ensure they are fit for purpose and look for opportunities to expand successful programs into other jurisdictions.
- **Recommendation 26:** Ensure laws in each jurisdiction include mandatory misidentification factors for police to take into account when responding to DFV, that can be reviewed by courts.
- **Recommendation 27:** Prioritise investment in DFV specialist legal services that are long-term, sustainable and meet demand.

PRIORITY 1: VICTIM-SURVIVORS

Immigrant and Refugee Women

Immigrant and refugee women face additional barriers to escaping DFV situations as they may not have a permanent visa status. Visa sponsorship can establish an uneven power dynamic where a victim survivor may depend on the user of violence to remain in Australia and connected to their children. Conditions on temporary visas may make them particularly vulnerable to DFV as they are restricted from accessing employment, social security payments and housing. Immigrant and refugee women are often financially dependent on their violent partners and may be isolated from friends and family who live overseas.

Family Violence Provisions have been introduced to assist immigrant and refugee women experiencing DFV, but they apply unevenly to different visa categories. There may also be barriers to accessing these provisions where women, who have been subjected to coercive control or financial abuse, may not have access to supporting documentation to prove that they are in a genuine relationship or are experiencing DFV. These provisions are also restricted to intimate partner violence and do not include other forms of family violence such as elder abuse. Adopting the New Zealand model, these provisions should be extended to other victim survivors of family violence.

Immigrant and refugee women may have complex circumstances that requires them to navigate multiple justice systems from family law to immigration. In regional areas, there is limited availability of key services for immigrant and refugee women; in

particular, interpreters and migration legal services.¹ Under the Migration Project, CAWLS has previously provided legal education and advice to victim survivors from culturally and linguistically diverse (**CALD**) backgrounds experiencing DFV in Central Australia and the Barkly. The program provided specialist migration advice to immigrant victim survivors with a focus on engaging with women on temporary visas. Despite positive outcomes, the program did not receive ongoing funding. There is now a gap in specialist legal services assisting immigrant and refugee women in Central Australia and the Barkly.

First Nation's Women in Remote Communities

CAWLS supports a focus on Aboriginal and Torres Strait Islander women as a priority group of victim-survivors in the Second Action Plan as they disproportionately experience (**DFV**). In the Northern Territory, the domestic violence related homicide rate is 7 times the national average while the assault rate is 3 times higher than the national average.² The majority of victim survivors of domestic violence related assault and sexual assault were Aboriginal women and girls.³ Aboriginal women are also 32 times more likely than non-Aboriginal women to be hospitalised and 10 times more likely to die from violent assaults than non-Aboriginal women.⁴

As a part of the National Agreement on Closing the Gap, the Australian Government has committed to reducing the rate of all forms of family violence and abuse against Aboriginal and Torres Strait Islander women and children by at least 50%.⁵ In order to reach this target, significant funding is needed for DFV services where Aboriginal women and girls live. The Northern Territory has the largest proportion of Aboriginal people compared to any other jurisdiction with Aboriginal Territorians accounting for over 30% of the NT population. 77% of Aboriginal Territorians live in remote or very

¹ Vaughan, C, Davis, E, et al, 'Promoting community-led responses to violence against immigrant and refugee women in metropolitan and regional Australia (ASPIRE Research Report', ANROWS Horizons, December 2016) 4 <chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://anrows-2019.s3.ap-southeast-2.amazonaws.com/wp-content/uploads/2019/01/19030038/Aspire_Horizons_FINAL.pdf>.

² NT Domestic, Family and Sexual Violence Interagency Coordination and Reform Office, 'Mapping of current investment and activity to prevent and respond to domestic, family and sexual violence in the Northern Territory' (Report, 1 May 2023) 19 <chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://families.nt.gov.au/media/documents/domestic-violence/dfs-v-mapping-report.pdf>.

³ NT Government, 'NT Domestic and Family Violence Risk Assessment and Management Framework' (September 2020) 28 <chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://families.nt.gov.au/media/documents/domestic-violence/risk-assessment-management-framework.pdf>.

⁴ Ibid, 39

⁵ 'Aboriginal and Torres Strait Islander Families and Households are Safe, *Closing the Gap* (Web Page) <https://www.closingthegap.gov.au/national-agreement/national-agreement-closing-the-gap/7-difference/b-targets/b13>.

remote areas of the NT.⁶ Investment in specialist DFV and legal outreach services is needed in remote areas of the NT to reach Aboriginal women who are most at need.

Recommendation 1: The Second Action Plan identifies Aboriginal and Torres Strait Islander and immigrant and refugee women and girls as a priority groups of victim-survivors.

Recommendation 2: Family Violence Provisions are extended to encompass family and close personal relationships beyond intimate partner relationships

Recommendation 3: Lowering evidentiary requirements for establishing a 'genuine' relationship and the presence of DFV to make the Family Violence Provisions more accessible to victim survivors

Recommendation 4: Additional funding is provided to all community legal centres providing services in Central Australia and the Barkly

Recommendation 5: Introduce a new substantive family violence visa for those on temporary visas not captured by the Family Violence Provisions drawing from models in New Zealand and Canada

Integrated Community Justice Partnership

CAWLS is currently delivering an Integrated Community Justice Partnership (ICJP) program providing free legal outreach to women and girls living in eight remote communities across Central Australia.⁷ The ICJP is a three-year pilot program funded by the Department of Social Services until June 2028. The ICJP delivers a partnership-based program to strengthen the capacity and capability of remote communities to respond to DFV from primary prevention, early intervention and crisis response, through a socio-ecological model. The ICJP program works in collaboration with a variety of Aboriginal Community-Controlled Organisations (**ACCOs**) to develop community-led solutions to DFV. The ICJP provides a range of wrap-around legal services for women of all ages, including the following:

- Legal advice and outreach in civil and criminal law, family law, child protection, and housing;
- Duty lawyer services at circuit courts;

⁶ NT Government, 'NT Domestic and Family Violence Risk Assessment and Management Framework' (September 2020) 30 <[chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://families.nt.gov.au/media/documents/domestic-violence/risk-assessment-management-framework.pdf](https://families.nt.gov.au/media/documents/domestic-violence/risk-assessment-management-framework.pdf)>.

⁷ Including Kintore, Ti Tree, Laramba, Yuendumu, Papunya, Mutijulu, Impanpa and Fike.

- Financial counselling including support with social security payments, housing and utility debts and DFV grants and loans; and
- Social support and education from capability workers to provide wrap-around supports.

The ICJP also provides whole of community services regardless of gender, including the following:

- Community engagement and development including primary prevention of DFV;
- Legal education on a range of topics including housing rights, financial literacy, legal rights, police powers and child protection; and
- Free tailored professional development to local staff to improve their responses to domestic and family violence, and child protection.

The ICJP goes beyond crisis legal work and adopts a partnership led model to increase access to justice in remote communities. In addition to providing specialist DFV services, the program addresses the drivers and compounders of DFV by offering a full spectrum, multi-disciplinary community legal service model to remote communities. It has a strong focus on addressing the structural drivers of DFV identified in the National Plan including housing and economic security. We develop strong partnerships with local ACCO's and provide targeted professional development to their staff, strengthening the capacity of the sector overall. This is an important project providing Aboriginal victim survivors wrap-around socio-legal supports where they live.

Local Link Project

To support a whole of system support, CAWLS is delivering DFV training to health providers across Central Australia. The NT Risk Assessment Management Framework (**RAMF**) requires 'universal services' who may encounter DFV victim survivors as part of their work providing health, education or housing services to identify and respond to DFV even if this is not their core business. There are also strict mandatory reporting requirements for DFV and child abuse which requires non-legal services to understand their legal obligations and make reports accordingly.

As a part of the Local Link project, through the NT Primary Health Network, CAWLS works in partnership with local primary health care clinics across Central Australia to provide training on how to embed DFV screening, safety planning and referrals into their business structures. We also provide training and governance support to assist health providers with initial screening of DFV, best-practice responses and mandatory reporting obligations. CAWLS is also establishing a secondary consultation service where health providers can contact CAWLS and seek specific advice on challenging DFV matters. Currently, the Local Link project only supports health providers. There is

an opportunity to support other universal services, such as schools and housing services, to adopt best practice responses to DFV through a Local Link style partnership with specialist DFV services. This program should focus on universal services that work with Aboriginal women in remote communities.

ACCO Partnership Accreditation

ACCOs are essential to uplifting Aboriginal women and girls. They provide culturally safe services, drive self-determination and deliver better outcomes through community governance. To strengthen the community-controlled sector, an Aboriginal-partnership accreditation framework could be developed that recognised organisations that provide safe and inclusive services for Aboriginal communities similar to the Rainbow Tick program for the LGBTIQ+ community. The Aboriginal-partnership accreditation process could recognise specialist services who work in partnership with ACCOs to deliver DFV and other services to Aboriginal communities. Under the program, accredited services could access specific grant funds which would encourage more services to adopt best-practice models of working in collaboration with ACCOs. The accreditation program aligns with Closing the Gap commitments by strengthening partnerships with ACCOs and building the capability of the community-controlled sector.⁸

Recommendation 6: The ICJP program be extended beyond its initial pilot and extended into the Barkly region

Recommendation 7: A program should be introduced to support non-specialist providers responding to DFV by adopting a partnership model with specialist DFV services like the Local Link project,

Recommendation 8: An accreditation program is implemented to recognise specialist services that uplift, and work in partnership with, ACCOs to deliver services to Aboriginal communities.

PRIORITY 2: PRIMARY PREVENTION & EARLY INTERVENTION

Public Housing

Housing affordability is a major issue across Australia and the Northern Territory with low supply, rising interest rates and weekly rent, but even more critical in our community. Through Closing the Gap, the Australian Government has committed to increasing the proportion of Aboriginal and Torres Strait Islander people living in

⁸ Closing the Gap, Priority Reforms 1 & 2.

appropriately sized (not overcrowded) housing to 88 %.⁹ The NT is far behind all other states and territories sitting at 43.4 % of its target.¹⁰ Overcrowded and poorly maintained housing exacerbates violence against women and children.¹¹ Conversely, stable housing can be a protective factor against domestic violence. There is a real need to provide adequate and appropriately sized housing in the Northern Territory to address systemic disadvantage as one of the drivers of DFV.

Many of our clients live in public housing in remote Aboriginal communities across Central Australia and the Barkly. They live in over-crowded properties due to housing shortages. One of the main issues we discuss with clients, as a part of the ICJP program, is a lack of maintenance on existing properties. When clients present to CAWLS, they often advise us that they have been waiting 6-8 months for housing repairs with no response. Some of the housing repairs and maintenance issues include:

- exposed electrical wiring, with clients and their children receiving electric shocks from exposed wiring at home;
- leaking roofs;
- no hot water; and
- blocked sinks.

These reports are supported by residents in other remote Aboriginal communities. For instance, in Papunya, residents have reported broken air conditioners, a lack of insulation and shading leaving public housing uninhabitable in Summer.¹² While in Santa Terea, residents reported homes without electricity, hot water or functioning toilets.¹³ One resident even reported not having a back door in the doorframe for 68 months.¹⁴ These are serious faults which make properties unsafe for our clients and their families to remain in. The lack of adequate, safe housing puts more pressure on families and exacerbates DFV.

⁹ Australian Government, 'Socio-economic outcome area 9 – Aboriginal and Torres Strait Islander people secure appropriate, affordable housing that is aligned with their priorities and need' *Closing the Gap: Information Repository* (Web Page) <<https://www.pc.gov.au/closing-the-gap-data/dashboard/outcome-area/housing/>>.

¹⁰ Ibid.

¹¹ Australia's National Research Organisation for Women's Safety, 'Domestic and family violence, housing insecurity and homelessness: Research synthesis' (2nd Ed, ANROWS Insights, July 2019) 3 <chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://anrows-2019.s3.ap-southeast-2.amazonaws.com/wp-content/uploads/2019/03/08034450/DV-Housing-Homelessness-Synthesis-2.Ed_.pdf>.

¹² Elise Lange & Matt Garrick, 'Papunya residents living in extreme heat sue NT government over unsafe housing' *ABC News* (Web Page, 22 April 2026) <<https://www.abc.net.au/news/2026-04-22/papunya-sues-nt-government-unsafe-housing-extreme-heat-climate/106566892>>.

¹³ Roxanne Fitzgerald, 'Residents of tiny NT community of Santa Teresa living in uninhabitable homes could wait years for compensation, court hears' *ABC News* (Web Page, 15 August 2024) <<https://www.abc.net.au/news/2024-08-15/nt-court-of-appeal-remote-public-housing-santa-teresa/104227546>>.

¹⁴ *Santa Teresa v Chief Executive Officer (Housing)* [2023] HCA 31.

Residents have previously been unable to access air conditioning in these communities as there is no requirement to provide any under the *Residential Tenancies Act 1999* (NT). Hot weather conditions can exacerbate DFV. A global scoping review found that women from low-income households were found to be vulnerable to heat-related violence. Similarly, women in rural areas, poorer households and with lower education were particularly vulnerable to intimate partner violence due to higher temperatures.¹⁵ Addressing housing inadequacy in the NT is key to preventing DFV.

Transitional Housing

A critical gap in the sector is the lack of crisis accommodation and transitional housing for women experiencing DFV. Transitional housing provides an important support to women experiencing DFV by providing wrap-around supports and providing a pathway to stable long-term accommodation. Under the Second Action Plan, the Australian Government has made a number of investments into housing victim survivors. However, these investments are currently not meeting demand. In Central Australia, there is often long waitlists for women seeking transitional housing. This leaves women heavily relying on familial supports, facing homelessness or returning to the user of violence. Over 40% of women who moved out of their home after they permanently left a violent partner, stayed with friends or family.¹⁶ If women need stable housing, particularly to maintain custody of children, they are more likely to return to the user of violence.¹⁷

The private rental market is also out-of-reach for women experiencing DFV due to financial insecurity. The average rent for a 3-bedroom house in the NT is \$710 per week which is the second highest average weekly rent in the country behind NSW.¹⁸ The waitlist for social housing in Tennant Creek is between 4-10 years and in Alice Springs, it is 8-10 years regardless of whether the applicant is considered a priority.¹⁹ One of the factors contributing to the long wait times for social housing is again a lack of maintenance on existing housing stock leaving houses vacant. In Alice Springs, 10% of the social housing supply is vacant due to lack of maintenance and repairs making the

¹⁵ Chiratidzo Mulambo, et al, 'Hot weather and violence against women: a global scoping review' (2025) 22(1069) *International Journal of Environmental Research and Public Health* 1, 8 <chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://pmc.ncbi.nlm.nih.gov/articles/PMC12295723/pdf/ijerph-22-01069.pdf>.

¹⁶ Australia's National Research Organisation for Women's Safety, 'Domestic and family violence, housing insecurity and homelessness: Research synthesis' (2nd Ed, ANROWS Insights, July 2019) 1 <chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://anrows-2019.s3.ap-southeast-2.amazonaws.com/wp-content/uploads/2019/03/08034450/DV-Housing-Homelessness-Synthesis-2.Ed_.pdf>.

¹⁷ Ibid, 3.

¹⁸ NT Council of Social Service, '2026 June Cost of Living in the NT Factsheet' (Fact Sheet, June 2026) 1 <https://ntcoss.org.au/cost-of-living-reports/2026-june-cost-of-living-in-the-nt-factsheet/>.

¹⁹ NT Government, 'Apply for Social Housing', *NT.GOV.AU* (Web Page) <https://nt.gov.au/property/social-housing/apply-for-housing/apply-for-public-housing/waiting-list>.

properties inhabitable.²⁰ Investment is needed in housing in the Northern Territory to address some of the primary drivers of DFV.

Recommendation 9: Construct, repair and maintain public housing in remote Aboriginal communities across the NT.

Recommendation 10: Ensure all public housing has access to air conditioning, particularly, in remote Aboriginal communities in the NT.

Recommendation 11: Construct medium to long term housing (such as transitional housing) for women in experiencing DFV in the Northern Territory.

PRIORITY 3: CHILDREN AND YOUNG PEOPLE IN THEIR OWN RIGHT

School Lawyer Program

Children and young people can often be exposed to DFV from their parents. Early intervention and prevention can be delivered through schools and education on healthy relationships. This is an important service to ensure that young people are aware of emerging issues such as technology-facilitated abuse.

CAWLS has previously provided partnered with local schools in Alice Springs to deliver an innovative school lawyer program providing community legal education and legal advice to young people experiencing DFV. The service operated as an early intervention and prevention service for young people in response to increasing numbers of youth-related DFV in the region. This program was funded by the NT Department of Children and Families (**DCF**) under the Early Intervention Grant – School Lawyer Program from December 2023 to June 2025 and received an extension to 30 June 2026. Despite positive outcomes, this project did not receive ongoing funding into this financial year. There is an opportunity for an ongoing school lawyer program to provide community legal education on the drivers of gendered violence, healthy relationships and information about consent.

Client Support Workers

In the NT, Children who experience or witness DFV are often referred to DCF for potential child abuse. In the Interim Report into the Conduct of the DCF into the management of Kumunjayi Little Baby (**KLB**), they found that DFV accounts for

²⁰ Elsie Lange, 'Alice Springs residents waiting 10 years for public housing while homes sit vacant' *ABC News* (Web Page, 15 Jan 2026) <<https://www.abc.net.au/news/2026-01-15/nt-public-housing-waitlist-vacant-homes-in-disrepair/106228236>>.

approximately 34% of DCF's work although many believe that number is higher.²¹ Despite this number, DCF do not routinely undertake DFV risk assessments in accordance with the RAMF. The report found that no risk assessments were done for *'KLB's mother which effectively left her with responsibility of protecting her children while experiencing DFV herself, without DCF adequately identify the risks posed by the perpetrator's behaviour and the impact of the violence on children'*²²

The NT Parliament has recently passed amendments to the *Care and Protection of Children Act 2007* (NT) which introduced a rigid 2-year timeframe for reunification of families. If this is not achieved, a permanent long-term order will be made for the child to remain in the care of the CEO until they turn 18 years old. Lawyers are limited in what they can do once child protection orders are made.

To support children and families experiencing DFV, investment is needed in dedicated child protection client support workers in specialist domestic violence services. These workers would support early intervention by addressing child safety concerns, supporting women experiencing DFV and assisting with reunification. Often families are reluctant to work with DCF due a fear of child removals. A client support worker can act as an advocate for families and start working with them prior to legal proceedings commence.

Once legal proceedings are concluded and an Order is confirmed, the client support worker can work with the legal team to hold DCF accountable and ensure they are upholding their obligations under any Orders. Workforce pressures in DCF have led to non-compliance with care plans, reunification plans and court orders which cannot continue given the new 2-year reunification timeframe.

Recommendation 12: Provide a school lawyer program to reach young people and provide education on gendered violence and healthy relationships.

Recommendation 13: Dedicated child protection client support workers should be embedded into all DFV specialist services in the NT

PRIORITY AREA 5: SYSTEM INTEGRATION AND WORKFORCE

The Federal Circuit and Family Court of Australia

The Federal Circuit and Family Court of Australia (**FCFCOA**) offers a range of case management pathways and programs that support families experiencing DFV including

²¹ Karen Webb & Greg Shanahan, *Independent Review into the Conduct of the Department of Children and Families* (Interim Report, 27 July 2026) 5.

²² *Ibid*, 6.

the Lighthouse program. Lighthouse provides initial risk screening, triage and case management to expediate matters that involve DFV to reduce opportunities for systems abuse. The Lighthouse program is available in Darwin but not in Alice Springs despite Darwin providing registry and circuit court services to Alice Springs. There is a real opportunity to build upon this existing program and deliver them in areas that are most in need. There is also no physical FCFCOA registry in Alice Springs, it is only available online which disadvantages self-represented clients who may not be technologically literate or have difficulty accessing a computer and printer. It also makes it impossible for unrepresented parties to review 'view only' material such as subpoenas and 67ZBD/E reports.

Under the Lighthouse program, parties are invited to complete a Family DOORS Triage risk screen at the commencement of proceedings. While this is a great initiative, it is a one-off risk assessment and does not reflect the dynamic nature of risk over the life of a matter. Court proceedings can put additional stress and pressure on families which can increase the risk of DFV. Risk assessments under the Lighthouse program should be dynamic and include multiple opportunities for assessment as circumstances change throughout proceedings.

There is also a need for Court Child Experts (**CCEs**) to attend Aboriginal Communities for the purposes of preparing Family Reports. Currently, clients experiencing DFV, who do not have access to a private vehicle, must travel to Alice Springs by bush bus to attend appointments with CCEs. They are often compelled to stay for one week due to the infrequency of bush buses travelling between Alice Springs and their respective communities. CAWLS often supports these women by funding their accommodation in Alice Springs which is a drain on our limited resources. The requirement for extensive travel (including up to 9 hours driving each way) under these circumstances not only places financial strain on parties, but it is also disruptive to family routines, and places women and children at increased risk of violence.

CCEs should be funded to travel to remote communities, especially communities that have accommodation facilities for visiting government and health care workers, and an airstrip. This is particularly required for Aboriginal and Torres Strait Islander children, who's rights including the right to connection to Country. While it is not expected that CCEs should undertake cultural reports beyond their qualification, it is submitted that its in the child's best interests for meetings for the preparation of Family Reports be held on Country wherever possible due to Aboriginal children's connection to Country, culture, kin and language.

To enable this, the FCFCOA should develop working relationships with various remote health services to facilitate accommodation for CCEs and potentially judicial officers for bush court proceedings. The FCFCOA should develop working relationships with

remote health clinics, as a consistently reliable service in remote communities, to facilitate remote court appearances. Commonwealth funding should be allocated to the installation and maintenance of IT and the use of clinic spaces for remote observations by CCEs when preparing Family Reports. These investments would keep women and children safer, as they would not need to travel. These measures would reduce barriers to justice and assist vulnerable people participate in FCFCOA.

Recommendation 14: the Lighthouse program should be expanded to include property matters and be offered in Alice Springs and other circuit court jurisdictions.

Recommendation 15: the Family DOORS Triage Questionnaire should be made available in all required languages including First Nation's languages.

Recommendation 16: the Family DOORS Triage Questionnaire should not be a one-off risk assessment but a dynamic risk assessment which occurs across the life of a matter.

Recommendation 17: Cultural Liaison Officers and Disability Liaison Officers should be expanded to Alice Springs and other circuit court jurisdictions.

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Recommendation 20: the FCFCOA should build relationships with remote public health services to facilitate remote appearances, interviews and observations with CCEs.

Recommendation 21: Where FCFCOA registries are co-located in Local Courts, such as the case in Alice Springs, funding should be allocated to facilitate electronic viewing of read only material.

Financial Counselling

As a part of our wrap-around supports, CAWLS has an integrated financial counselling team as a part of our specialist DFV service. Many women need assistance with debt as a result of financial abuse or need financial support to escape violence. A recent study

has found that the immediate cost of women leaving DFV has risen by 71% since 2016 from \$4,098 to \$7,017.²³ We support women experiencing DFV by assisting them with:

- various types of debts including rental arrears, unpaid fines, utility debts and By Now, Pay Later debts – among others;
- navigate and make applications for various DFV grant and loans; and
- deceased estates and superannuation applications.

Women experiencing financial abuse often don't recognise it which can adversely impact statistics and research into its prevalence.²⁴ We help client's identify financial abuse and provide strategies to prevent it. We also assist them manage their own finances through budgeting and money management.

The Department of Social Services (**DSS**) provides funding to financial counsellors across Australia through the Financial Counselling Industry Fund. Unfortunately, many Community Legal Centres (**CLC**) have been unsuccessful in obtaining funding through this scheme despite successful financial counselling teams already being embedded in CLCs. Recognising the value of financial counsellors working with clients in CLCs, the Financial Counselling Industry Fund has approved grants to fund some of the CLCs including CAWLS. DSS should provide ongoing funding to DFV Financial Counsellors in all specialist DFV legal services across Australia to address financial abuse and support women leaving violence. This integrated model ensures that victim survivors not only access legal support but vital financial support too.

Police Responses

Police responses to DFV are inadequate. In the Inquest into the deaths of Miss Yunupinu, Ngeygo Ragurk, Kurmarn Rubuntja and Kumanjayi Haywood²⁵, the Coroner identified multiple incidents when NT police failed to appropriately respond to Triple-0 calls reporting domestic violence including failing to respond with an appropriate response time or at all, failing to identify coercive control and misidentifying the victim survivor.²⁶

These responses prevent victims from receiving life-saving assistance and erode trust and confidence in the Police. These responses discourage victim-survivors from seeking

²³ Isabella Ross, 'Immediate financial cost for victim0survivors leaving domestic violence rises 71pc, research says' *ABC News* (Web Page, 28 July 2026) <<https://www.abc.net.au/news/2026-07-28/immediate-cost-to-leave-domestic-violence-relationships-revealed/106943154>>.

²⁴ Jozica Kutin, et al, 'Economic Abuse between intimate partners in Australia: prevalence, health status, disability and financial stress' (2017) 41(3) *Australian and New Zealand Journal of Public Health* 269.

²⁵ [2024] NTLC 14.

²⁶ *Ibid* at [460], [484]-[496], [500(c)-(d)].

help and perpetuate mistrust in services designed to support and protect victim-survivors.

To support NT Police's capacity to respond to Triple-0 calls for assistance, the NT Government has accepted a recommendation from the NT Police Review to employ an additional 200 sworn officers over a four-year period.²⁷ Despite this commitment, CAWLS continues to hear from First Nation's clients living in remote communities that NT Police are still not appropriately responding to domestic violence incidents. In the past 12 months, CAWLS clients have informed us that NT Police have:

- Failed to attend multiple Triple-0 call outs for domestic violence incidents at all;
- Failed to speak to, or take statements from, witnesses to domestic violence incidents; and
- Failed to inform or explain to the client (protected person) when police have issued temporary domestic violence order.

The Australian Government, through the First Action Plan, has committed to *'improve police responses and the justice system to better support victim-survivors through the provision of trauma-informed, culturally safe supports that promote safety and wellbeing, and hold people who choose to use violence to account'*.²⁸ This action continues to be relevant and more work is needed in this space to support victim survivors experiencing DFV.

The use of incident-based approaches is inappropriate in the context of DFV. Incident-based policing fails to account for the gendered, pattern-based dynamics and non-physical aspects of DFV. It can lead to inaction or misidentification by police attending an incident. Misidentification has long-term impacts, including criminalisation, loss of housing, employment and care of children. Misidentification can also make victim-survivors more vulnerable to systems abuse by the perpetrator.²⁹

There are a number of promising programs in the NT to improve police responses to DSFV including the Prevent Assist Respond Training (**PART**), the Co-responder model, and the Family Harm Coordination Daily Audit. These programs help keep police

²⁷ NT Government, 'NT Police Review' *Department of the Chief Minister and Cabinet* (Web Page) <<https://cmc.nt.gov.au/supporting-government/strategies-and-plans/nt-police-review>>; NT Government, 'Northern Territory Police Review' (Report, 28 March 2024) 35-38 <<chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://cmc.nt.gov.au/media/docs/strategies-and-plans/nt-police-review/ntpf-review2024.pdf>>.

²⁸ Action 9 of the First Action Plan under Australia's National Plan to End Violence against Women and Children 2022-2032.

²⁹ Heather Nancarrow, et al 'Accurately identifying the "person most in need of protection" in domestic and family violence law' (ANROWS Research Report, No 23, November 2020) 30-31 <<https://anrows-2019.s3.ap-southeast-2.amazonaws.com/wp-content/uploads/2019/10/25104930/Nancarrow-PMINOP-RR.3.pdf>>.

accountable, improve communities' trust in police and offer opportunities to improve responses to DFV overall. An evaluation of these programs should be undertaken to ensure they are fit-for-purpose and look for opportunities to expand successful programs to other jurisdictions.

Recommendation 22: Department of Social Services should provide ongoing funding to DFV Financial Counsellors in all specialist DFV legal services across Australia to address financial abuse and support women leaving violence

Recommendation 23: NT Police need to recruit, train and retain staff, especially in remote communities to be able to meet demand.

Recommendation 24: Scale the PARt program to ensure all police officers receive the specialised training they need to respond to DFV as soon as possible

Recommendation 25: Evaluate the Co-responder program and Family Harm Coordination Daily Audit to ensure they are fit for purpose and look for opportunities to expand successful programs into other jurisdictions.

Recommendation 26: Ensure laws in each jurisdiction include mandatory misidentification factors for police to take into account in responding to DFV, that can be reviewed by courts.

Workforce and Investment

Investment in legal services is an essential part of ensuring that victim survivors are able to access the justice system and ensure their safety and ongoing financial independence. The DFV sector requires consistent, long-term funding to effectively deliver prevention, early intervention, response and recovery. CAWLS, like many community legal centres receives the majority of its funding through the National Access to Justice Partnership (**NAJP**). However, the funding provided under NAJP is insufficient to meet demand and the high cost of service delivery in regional and remote areas. Funding should not be determined on a per capita basis but based on un-met needs. Currently, CAWLS supplements its funding with other short-term grants to deliver the services that the community needs in Central Australia and the Barkly.

The sector is reliant on time-limited pilot program funding which is not always extended despite the demand and the success of the program.³⁰ This not only affects the

³⁰ See the School Lawyer Program or Migration Project above

community's access to legal services but the sector's ability to attract and retain staff with specialist DFV skillsets.

Recommendation 27: Prioritise investment in DFV specialist legal services that are long-term, sustainable and meet demand.