



31/07/2026

Department of Social Services
Australian Government
Canberra
ACT

To the Department of Social Services,

RE: Consultation on the Second Action Plan- National Plan to End Violence Against Women and Children 2022-2032

The Northern Territory Council of Social Service (NTCOSS) is a 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 that work in social and community service delivery, sector development and advocacy.

NTCOSS is funded by the NT Government (NTG) for a domestic, family and sexual violence (DFSV) policy officer role. As such, NTCOSS advocates for and with the specialist 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 Organisations (ACCOS), Aboriginal Family Violence Legal Services, remote safe houses, women's shelters, men's behavioural change programs, DFSV specialist counselling services, social work and family support services and programs, specialist DFSV legal assistance services, women's legal services and specialist sexual violence services.

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 recognises the diversity of the NT, where nearly one-third of Territorians come from multicultural and refugee backgrounds.¹ Cultural safety must therefore be understood as encompassing both Aboriginal and multicultural worldviews, histories, and experiences.

NTCOSS acknowledge the courage, strength, and dignity of all victim-survivors of domestic and family violence. We remember the people who have lost their lives to DFSV in the NT and across Australia. We stand in solidarity with victim-survivors, their families, and communities, and recognise the ongoing work required to end DFSV and create safer communities.

NTCOSS and its members support the key themes identified in the ANROWS Consultation Paper and recognise that these represent ongoing areas of focus that are essential to achieving the vision of the *National Plan to End Violence against Women and Children 2022-2032* (National Plan) of ending violence against women and children in Australia.

NTCOSS considers the following areas to be critical to achieving the objectives of the National Plan and supporting the effective design and implementation of the Second Action Plan (2AP) in the NT.

¹ NTG Multicultural Strategy Consultation Paper (2025)



Recognition of the NT Context

The NT continues to experience the highest rates of domestic, family and sexual violence in Australia. On average, there are 115 incidents of domestic violence reported each day in the NT.² This violence disproportionately impacts Aboriginal and Torres Strait Islander women and children.³

The NT is one of the most culturally and linguistically diverse jurisdictions in Australia. With a population of approximately 265,500 people, Aboriginal people represent approximately 30.8% of the Territory's population, 21.8% were born overseas, and 32.7% speak a language other than English at home.⁴

The NT has by far the highest rate of family and domestic violence-related hospitalisations in Australia—708.3 per 100 000 population, approximately 25 times the national average of 25–30 hospitalisations per 100,000.⁵ DFSV harm and subsequent hospitalisation also increase with remoteness.⁶

In the NT, DFSV services report that the largest proportion of service users identify as Aboriginal and/or Torres Strait Islander, followed by women from culturally and linguistically diverse backgrounds. However, the experiences of people with a variety of intersectional factors are likely underreported and not well understood.⁷

Specialist multicultural organisations continue to see significant presentations of domestic, family and sexual violence among migrant and refugee women and families. However, the true prevalence remains difficult to quantify because NT data systems do not consistently capture cultural and linguistic diversity, migration pathways or settlement experience. The absence of robust data should not be interpreted as an absence of need. Rather, it reflects longstanding gaps in culturally responsive identification, engagement and data collection across the DFSV system.

For many victim-survivors across the NT, disclosing violence and accessing support is complicated by barriers such as stigma, fear and repercussions from reporting; dependence on the person using violence (PUV), and concerns about harmful or ineffective systemic and service responses.⁸ These barriers can be particularly acute in remote and very remote communities, where close family and community relationships, limited service availability,

² <https://pfes.nt.gov.au/newsroom/2024/new-years-day-day-increased-risk-domestic-violence-northern-territory>

³ The Equality Institute, Evidence Snapshot: What We Know About Domestic, Family, and Sexual Violence in the Northern Territory—and What We Don't (2023), https://www.equalityinstitute.org/media/pages/resources/evidence-snapshot-whatwe-know-about-domestic-family-and-sexual-violence-in-the-northern-territory-andwhat-we-don-t/6b0ee996d9-1686115013/nt_evidence_snapshot_eqi.pdf.

⁴ Northern Territory Government, 'Population', *Northern Territory Economy*, accessed 16 July 2026, <https://nteconomy.nt.gov.au/population>; Office of Gender Equity and Diversity, *Gender Equity and Diversity Series: Volume 1 – Gender, Identity and Work in the NT* (Northern Territory Government, 2025).

⁵ AIHW NHMD, 2023–24. <https://www.aihw.gov.au>

⁶ AIHW NHMD, 2023–24. <https://www.aihw.gov.au>

⁷ <https://www.pmc.gov.au/sites/default/files/resource/download/unlocking-the-prevention-potential-4.pdf>

⁸ Vimbai Mutero, "Implementing National Gender-Based Violence Frameworks in Remote and Multicultural Contexts: Lessons from the Northern Territory," in *Northern Territory Insights: Gender Equity and Diversity in Focus*, ed. Andrew Taylor and Minoli Jayasinghe, Northern Institute Gender Equity and Diversity Series, vol. 2 (Northern Territory Office of Gender Equity and Diversity, 2026), 37–60.



workforce shortages, and geographic isolation can increase both the risks associated with seeking help and the challenges of accessing appropriate support.

At the same time, the NT has significant strengths that underpin effective responses to DFSV. Strong family, kinship and community networks provide practical support, guidance and informal safety mechanisms. Community-led initiatives, including women's and men's groups, local cultural programs and grassroots safe places, play an important role in prevention, early intervention and healing. The leadership of Elders, respected community members and cultural knowledge holders also strengthens responses by providing guidance, promoting accountability, and supporting culturally grounded approaches that reflect local values, relationships and traditions.⁹

Multicultural communities also possess significant protective factors that should be recognised. Strong family networks, cultural leadership, faith communities and community organisations often provide the first source of support, advice and accountability for individuals experiencing or using violence. Building on these strengths through culturally responsive engagement can strengthen early intervention, reduce isolation and improve pathways into specialist support.

NTCOSS recommends 2AP:

- Recognises the NT's unique context and conditions
- Recognises the strengths across both Aboriginal and Torres Strait Islander and non-Indigenous communities, essential for DFV responses to be culturally safe, effective, and sustainable.¹⁰

Implementation considerations and facilitators for the Second Action Plan in the NT

Effective implementation of the 2AP will require recognition of, and support for, jurisdictions to respond to their unique circumstances, including differences in geography, population, service systems and workforce capacity.

For the NT, this means recognising the ongoing impacts of colonisation as a driver of the highest rates of DFSV in Australia, which occur alongside significant poverty, homelessness, overcrowding and substance abuse; and the challenges associated with remoteness, workforce shortages and limited-service availability.¹¹

⁹ Harry Blagg, Emily Williams, Eileen Cummings, Victoria Hovane, Margaret Torres and Kristina N. Woodley, *Innovative Models in Addressing Violence Against Indigenous Women* (Sydney: Australia's National Research Organisation for Women's Safety Limited, 2018), <https://www.anrows.org.au/publication/innovative-models-in-addressing-violence-against-indigenous-women-final-report/>

¹⁰ Australian Government Department of Social Services, *Our Ways – Strong Ways – Our Voices: National Aboriginal and Torres Strait Islander Plan to End Family, Domestic and Sexual Violence 2026–2036* (Canberra: Department of Social Services, February 2026), <https://www.dss.gov.au/system/files/documents/2026-02/our-ways-strong-ways-our-voices.pdf>.

¹¹ Australian Council of Social Service, "Rate of Poverty by State/Territory of Residence of People," *Poverty and Inequality in Australia* (2023), <https://povertyandinequality.acoss.org.au/poverty/rate-of-poverty-by-state-territoryof-residence-of-people/>; Australian Bureau of Statistics, "Estimating Homelessness: Census," (2023), <https://www.abs.gov.au/statistics/people/housing/estimating-homelessnesscensus/latest-release>; .NT Shelter, "Educational Resources – Latest Facts and Statistics," (2023), <https://ntshelter.org.au/educational-resources/> and Australian Institute of Health and Welfare, "Alcohol, Tobacco & Other Drugs in Australia: People Experiencing Homelessness," (2024), <https://www.aihw.gov.au/reports/alcohol/alcohol-tobacco-other-drugsaustralia/contents/priority-populations/people-experiencing-homelessness>.



Research examining the implementation of national gender-based violence frameworks in remote and multicultural contexts highlights that approaches developed in jurisdictions with greater service capacity and institutional infrastructure may not translate effectively to remote settings.¹² In these contexts, victim-survivors may experience fragmented service responses, limited pathways to safe housing, and barriers created by systems that do not reflect remote community realities.¹³

In Aboriginal communities in the NT, systems including child protection, justice and policing have been shaped by historical and ongoing experiences of state intervention and harm. This influences trust, engagement and willingness to seek support from the social and community sector and DFSV services. The NT's multicultural communities experience distinct barriers relating to language, settlement, migration, visa insecurity and cultural understanding of service systems.

NTCOSS supports the commitment in the consultation paper to Aboriginal leadership, genuine partnership with Aboriginal communities and investment in ACCOs. This must remain central to the design, delivery and evaluation of responses affecting Aboriginal communities, and it is vital for culturally safe and community-led responses. The 2AP should include clear mechanisms to ensure Aboriginal community control and governance are reflected across all activities and outcomes.

This commitment should be complemented by meaningful partnerships with specialist multicultural organisations and multicultural community leaders to ensure responses are culturally responsive across the NT's diverse population. NTCOSS recommends:

- Development and implementation of 2AP acknowledge the ongoing impacts of colonisation, racism, poverty and systemic disadvantage on experiences of DFSV and access to support.
- ACCOs, Aboriginal leaders and communities are appropriately resourced and supported to influence decisions that affect their communities.
- Strengthening community-led solutions and flexible, place-based approaches that recognise the diverse contexts and communities in which DFSV prevention, early intervention, response and recovery initiatives, services and programs are delivered.¹⁴

Ensuring Equitable and Sustainable Investment

Long-term investment, proportionate to the level of need in the NT is essential to building a DFSV system capable of responding to current demand and achieving long-term change. The Sector continues to experience short-funding cycles and piecemeal funding, which create instability, limit service continuity, and prevent organisations from undertaking meaningful workforce and service planning. The sector reports that they have found the National Partnership Agreement funding model inconsistent, ad hoc and therefore the funding is difficult to operationalise efficiently.

NTCOSS recommends:

- Long-term investment

¹² Mutero, "Implementing National Gender-Based Violence Frameworks in Remote and Multicultural Contexts"

¹³ Mutero, "Implementing National Gender-Based Violence Frameworks in Remote and Multicultural Contexts,"

¹⁴ Mutero, "Implementing National Gender-Based Violence Frameworks in Remote and Multicultural Contexts,"



- Funding agreements which account for the true costs of delivering specialist DFSV services in the NT, including the additional costs associated with remoteness, geographic dispersion, workforce recruitment and retention, infrastructure and service accessibility.

Building a sustainable DFSV workforce

The NT has a diverse DFSV sector and workforce with expertise across prevention, early intervention, response, recovery and healing. The Sector includes remote safe houses, women's shelters and refuges, men's behavioural change and healing programs, specialist DFSV counselling services, Aboriginal family violence legal services, women's legal services, specialist DFSV legal assistance services and specialist sexual violence services. This Sector includes a range of organisations, including non-government organisations, ACCOs and Aboriginal Community Controlled Health Services (ACCHSs).

The Sector is experiencing acute and compounding workforce pressures that threaten workforce sustainability, service continuity and the capacity of organisations to meet increasing demand. A recent NTCOSS workforce survey found that almost three-quarters of responding organisations have active vacancies, 16% of organisations manage more than 11 vacancies at a time, and one-third of vacancies take more than three months to fill.¹⁵

Sustaining an effective DFSV workforce in the NT requires ongoing investment in growing the sector, recruitment, retention, professional development, clinical and cultural supervision, leadership development and workforce wellbeing. Access to high-quality training, ongoing professional development and appropriate supervision is essential.

Workforce capability must include cultural responsiveness, migration literacy, effective interpreter practice and understanding of the unique dynamics of DFSV within multicultural communities.

Action Plan 1 included important workforce capability actions which have not been continued, completed or adequately resourced. The Bi-Annual Conference was last held in 2024, and the Sector has been advised it will not be held in 2026; the Training and Resource Centre has not been established, and there has been no process towards establishment and commissioning since November 2025; and the Sector regularly advises that Risk Assessment and Management Framework and Training requires updating and significant expansion into remote areas.^{16 17}

NTCOSS offers the following workforce initiatives for consideration:

- Include in the 2AP significant investment in growth of the DFSV workforce, support for recruitment in remote areas and funding for sector specific professional development including cultural and clinical supervision and leadership development.
- Provide funding to build capacity in mainstream services responding to gender-based violence, including the ability to accurately identify the 'person most in need of protection' and prevent misidentification.

¹⁵ NTCOSS Submission to the Development of the Workforce Strategy Consultation -https://ntcoss.org.au/wp-content/uploads/2026/02/Workforce-Strategy-Submission_NTCOSS.pdf

¹⁶ NT DFSV Training and Resource Centre – Consultation Paper October 2025

¹⁷ Strengthening Domestic and Family Violence Responses Across Eight Services in the Northern Territory Process Evaluation of the RAMF Champions Implementation Project 2023 – 2026 -



- Fund the expansion of the availability and breadth of social service sector TAFE and accredited training offerings across the NT, to increase skills across the DFSV sector.
- Invest in the development of tools and grants that strengthen staff wellbeing (personal and professional safety) within organisations.¹⁸
- Commitment to continuation, investment and competition of NT Workforce Capability activities under the first action plan.

Further considerations regarding the development of a sustainable DFSV workforce are outlined in the [NTCOSS NT Workforce Strategy Submission](#).

Addressing Systemic Barriers Impacting Victim-Survivors

The systemic barriers experienced in the Northern Territory are complex and interconnected, requiring coordinated reform across multiple systems. Four priority areas for action are strengthening trauma-informed and responsive practice across the child protection and justice systems, addressing housing insecurity and access to safe accommodation, improving access to culturally safe and responsive DFSV for the multicultural community, and strengthening specialist sexual violence prevention, response and recovery services.

The child protection and justice systems shape victim-survivors' experiences of seeking safety and support. When these responses are not trauma-informed, culturally safe or victim-survivor centred, they can create further barriers to DFSV disclosure, reduce trust in DFSV services and compound harm.

The NT faces significant housing challenges, including very long waiting lists for social housing, insufficient transitional and longer-term accommodation options for people leaving DFSV situations, and DFSV crisis accommodation services are consistently operating beyond capacity, turning away people seeking support every month.

Housing insecurity may be compounded for migrant and refugee women by visa dependency, limited family networks, financial abuse, discrimination in the private rental market and limited understanding of housing pathways, requiring culturally responsive support alongside broader housing reforms.

For many migrant and refugee families, experiences of violence intersect with settlement, trauma, language barriers, social isolation, financial dependence, visa-related vulnerabilities and unfamiliarity with Australian systems. These factors can delay disclosure and reduce engagement with support services. Culturally and linguistically diverse people experience barriers to reporting DFSV and accessing services due to a variety of factors including immigration and visa issues, cultural stigma, limited access to information in preferred languages and a lack of culturally appropriate DFSV services and programs.

The NTG has recognised domestic and family violence in multicultural communities as a priority through the development of the Northern Territory Multicultural Strategy, and consultations undertaken with multicultural communities continue to reinforce this as a significant and growing concern.

In the NT, specialist sexual violence services provide critical expertise that complements, but is distinct from, broader domestic and family violence responses. Effective prevention, response and recovery require a workforce with specialist knowledge of sexual violence and

¹⁸ Strengthening Domestic and Family Violence Responses Across Eight Services in the Northern Territory Process Evaluation of the RAMF Champions Implementation Project 2023 – 2026 -



continued investment in dedicated services. Without this explicit focus, sexual violence risks becoming overshadowed within broader domestic and family violence reform.

NT recommendations 2AP consider the following:

- Supporting a trauma-informed wider service system, including child protection and judicial systems, which are safe, consistent and supportive of victim- survivors.
- Increasing safe, secure housing, including social housing, public housing, transitional housing, and appropriate crisis accommodation options. This housing infrastructure needs to be made available across the whole NT, including remote and very remote areas and Aboriginal homelands.
- Recognise culturally and linguistically diverse, migrant and refugee communities as a priority population in DFSV response.
- Fund culturally and linguistically diverse specific DFSV services in the NT.
- Strengthen NT-wide data collection and investment in culturally responsive services to improve understanding of DFSV in multicultural communities and ensure equitable access to support.
- 2AP explicitly recognise sexual violence as a distinct area of practice by including dedicated actions that support specialist sexual violence prevention, response, recovery and workforce capability.

Community-Led Initiatives

The NT has significant strengths that underpin effective responses to DFSV- strong family, kinship and community networks, women's and men's groups, local cultural programs and grassroots programs and the leadership of Elders, respected community members and cultural knowledge holders.¹⁹

Many communities have developed innovative, context-specific strategies for prevention, early intervention, and healing that operate outside formal service frameworks.²⁰ This reflects the deep knowledge of local needs and realities.

In the NT, DFSV approaches should recognise the unique social, cultural, geographic and historical contexts in which DFSV occurs and be designed to reflect the communities they aim to support. This includes sustained investment in prevention programs delivered in language and guided by Aboriginal communities, Elders, community leaders and local knowledge holders, ensuring that approaches are culturally safe, relevant and grounded in community strengths. Prevention efforts should focus on engaging men and boys to challenge harmful attitudes, promote respectful relationships and disrupt intergenerational cycles of violence.²¹

Prevention and early intervention efforts must also recognise refugee and migrant populations in the NT who experience distinct and intersecting barriers to safety, access to services, and early support.

¹⁹ Harry Blagg, Emily Williams, Eileen Cummings, Victoria Hovane, Margaret Torres and Kristina N. Woodley, *Innovative Models in Addressing Violence Against Indigenous Women* (Sydney: Australia's National Research Organisation for Women's Safety Limited, 2018), <https://www.anrows.org.au/publication/innovative-models-in-addressing-violence-against-indigenous-women-final-report/>

²⁰ Harry Blagg et. *Innovative Models in Addressing Violence Against Indigenous Women* (Sydney: Australia's National Research Organisation for Women's Safety Limited, 2018)

²¹ Phan, H., Nguyen, H., Terry, D. et al. Barriers, enablers, and priorities for primary prevention of intimate partner violence for Aboriginal adolescents in the Northern Territory of Australia. *Discov Public Health*, 1150 (2026). <https://doi.org/10.1186/s12982-026-02499-5>



There is also a need to address DFSV within the NT LGBTQIA+ community, particularly the experiences of Trans-women and Sistergirls and Brotherboys of intimate partner violence and sexual coercion.²²

NTCOSS recommends 2AP:

- Prioritise and fund long-term, community-led prevention approaches that are appropriately resourced, culturally responsive and tailored to the diverse contexts of communities across the NT.
- Fund flexible, community-wide grants to support innovative, whole-of-community DFSV responses, particularly in remote communities.²³
- Invest in culturally safe, inclusive, and linguistically responsive DFSV prevention and early intervention initiatives for diverse communities in the NT including:
 - Refugee and migrant communities.
 - Aboriginal LGBTQIA+ people including Sistergirls and Brotherboys.
 - Wider LGBTQIA+ community including Trans women.
 - Men and boys.

Strengthening Sector Leadership and Coordination

The NT remains the only Australian jurisdiction without a DFSV peak body. For the past five years, policy officer positions at NTCOSS and AMSANT have provided limited sector leadership and coordination. However, funding for these roles is not confirmed beyond December 2026, creating uncertainty for the continuation of this work.

The NTCOSS DFSV Policy Officer currently facilitates an NT-wide DFSV network comprising more than 30 specialist member organisations. The network provides an important mechanism for sector coordination, collaboration, policy development and advocacy across the NT. NTCOSS also represents the NT as a member of the National Alliance of Domestic and Family Violence Peaks and Services, ensuring the NT's perspectives contribute to national advocacy and policy discussions. While these arrangements have strengthened the sector's capacity, they do not replace the functions of a dedicated peak body.

The NT would benefit from an independent DFSV advocacy mechanism to ensure the experiences and needs of victim-survivors, communities and service providers are effectively synthesised and represented. An independent advocacy mechanism is critical to ensuring policy and reform are informed by lived experience and frontline expertise.

NTCOSS recommends consideration of:

- Funding for a consultation process with specialist DFSV services, ACCOs, ACCHS's, multicultural communities, people with lived experience, and technical advisers to determine the best model for coordinated DFSV advocacy in the NT.
- Funding for the implementation of this model.

²² National Survey of LGBTQIA+SB Experiences of Sexual Violence – Summary Report, Gendered Violence Research Network, UNSW Sydney - <https://www.unsw.edu.au/content/dam/pdfs/ada/gvrn/research-reports/2025-03-national-survey-lgbtiqa-sb-experiences-of-sexual-violence-summary-report.pdf>

²³ Strengthening Domestic and Family Violence Responses Across Eight Services in the Northern Territory Process Evaluation of the RAMF Champions Implementation Project 2023 – 2026.



From Commitment to Implementation

The 2AP is an important opportunity to strengthen national action to end violence against women and children, while ensuring implementation reflects the realities of communities across the NT- flexible, place-based responses that recognise the NT's geographic, social, cultural and service delivery contexts, and the disproportionate impacts of DFSV on Aboriginal women, children, families and communities.

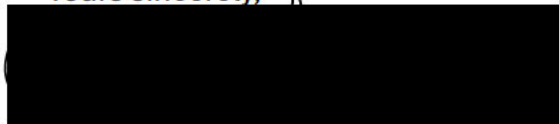
NTCOSS urges the Australian Government to support the 2AP with long-term investment, proportionate to need, in specialist DFSV services, workforce sustainability, housing pathways, and community-led prevention. Aboriginal leadership, governance and self-determination must be embedded across all stages of design, delivery, monitoring and evaluation.

NTCOSS also recognises that achieving the objectives of the Second 2AP requires equitable attention to the needs of culturally and linguistically diverse, migrant and refugee communities. This includes ensuring these communities are represented across policy, data collection, prevention, service design and investment, while recognising specialist multicultural organisations and community leaders as essential partners in delivering culturally responsive and accessible DFSV services across the Northern Territory.

The 2AP must move beyond commitment to support for implementation. Without immediate and sustained investment, governance and accountability, victim-survivors and communities across the NT will continue to face avoidable barriers to safety, support and recovery.

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

Yours sincerely, 





Interim CEO

