

NORTHERN TERRITORY DRAFT – REFRESHED DOMESTIC, FAMILY AND SEXUAL VIOLENCE (DFSV) REDUCTION FRAMEWORK CONSULTATION

August 2025

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YWCA Australia's Submission to the Northern Territory Consultation on the Draft – Refreshed Domestic, Family and Sexual Violence (DFSV) Reduction Framework

Table of Contents

YWCA Australia's Acknowledgements.....	3
About YWCA Australia and our Northern Territory Operations	4
A Government Backed Response Proportionate to the Scale of the Crisis	6
Procedural and Implementation Considerations for the Framework.....	7
Recognise DFSV as Gendered Issue which Disproportionately Impacts First Nations women.....	8
Sector-Led Engagement and Oversight.....	9
Review of Funding Allocations	9
Lived Experience Co-Design & Housing, Homelessness and DFV Pathways	14
More Comprehensive and Meaningful Targets.....	15
Overarching Recommendations.....	16
Draft Deliverables – YWCA Australia's Reflections	17
YWCA Australia's Commentary on the Draft Framework Deliverables.....	18

YWCA Australia's Acknowledgements

YWCA Australia acknowledges Aboriginal and Torres Strait Islander peoples as the First Peoples of this land. We recognise First Nations peoples as the custodians of the lands and waters, and carriers of cultural knowledge. We recognise the more than 65,000 years of caring for Country as the longest continuing culture in the world. We pay respect to the Larrakia people on whose lands we work to provide housing, homelessness and domestic and family violence services for women, gender-diverse people and their families.

YWCA Australia acknowledges that our organisation has a responsibility to work towards reconciliation and to the dismantling of structures that systemically harm Aboriginal and Torres Strait Islander peoples – including the overwhelming rates of domestic, family and sexual violence and homicides of First Nations women in the Northern Territory.

YWCA Australia acknowledges the entrenched and systemic nature of violence against First Nations women in the Northern Territory. Since 2000, 82 of the 87 women killed by a domestic partner in the Territory have been Aboriginal. This devastating statistic reflects not only ongoing systemic failures but also the enduring legacies and continuing impacts of colonisation on Aboriginal and Torres Strait Islander peoples.

YWCA Australia acknowledges the lives of four of the 82 Aboriginal women reported as killed by their domestic partners since 2000: Miss Yunupingu, Ngeygo Ragurk, Kumarn Rubuntja and Kumanjayi Haywood. We recognise that their deaths were preventable, and we affirm that urgent action is required to address the scale of gender-based violence against Aboriginal and Torres Strait Islander women in the Northern Territory.

YWCA Australia acknowledges and upholds our respect for the words of Shirleen Campbell, Tangentyere Women's Family Safety Group co-ordinator:¹

"We are not just numbers. We are not invisible women. Our sister, another one lost to us, is not just a number and we will not let her be invisible."

YWCA Australia acknowledges the past, present and continuing leadership of Aboriginal and Torres Strait Islander women in advancing the rights of women and children to safety and security in the Northern Territory and across the country.

We honour the Aboriginal and Torres Strait Islander women, families, communities and Aboriginal Community Controlled Organisations who gave evidence and contributed to the inquests into the deaths of Miss Yunupingu, Ngeygo Ragurk, Kumarn Rubuntja and Kumanjayi Haywood.

¹ ***Inquests into the deaths of Miss Yunupingu, Ngeygo Ragurk, Kumarn Rubuntja and Kumanjayi Haywood*** [2024] NTLC 14, 12 [8].

YWCA Australia reaffirms our deep commitment to ending domestic, family and sexual violence and to addressing the intersecting experiences of housing insecurity and homelessness for women and gender-diverse people, with particular recognition to the profound inequalities experienced by Aboriginal and Torres Strait Islander peoples.

About YWCA Australia and our Northern Territory Operations

YWCA Australia ('YWCA') is a leading national women's housing provider in Australia. YWCA's dedicated community housing subsidiary, YWCA National Housing, is a Tier 2 Community Housing Provider with a rapidly growing portfolio of 470 social and affordable homes nationally. We provide nearly 125,000 nights of affordable accommodation to women and gender-diverse people every year. In addition to housing, YWCA provides specialist homelessness support services, and domestic and family violence support services. YWCA is a key advocacy voice for gender-responsive housing solutions, informed by young women and gender-diverse people inheriting the housing and cost-of-living crises.

In the Northern Territory, YWCA provides both affordable housing, and tailored programs and services supporting women and gender-diverse people. This includes lived-experience leadership training and advocacy, emergency accommodation, transitional housing and case management supports, and immediate crisis accommodation for young people at risk of homelessness. YWCA's specialist domestic and family violence services in Darwin are bolstered with integrated homelessness support for Territorian women, gender-diverse people and their families.

YWCA partners with the NT government on a raft of wraparound services across Greater Darwin, Palmerston, and the surrounding areas, including:

- **The Connected Families Program:** Providing targeted assistance to young parents/carers aged 25 years and under, in parenting their children, including supporting them to reduce risk, increase housing security, and connect with employment, training and community supports so they can enjoy increased wellbeing and safety.
- **The Domestic and Family Violence Centre (DFVC):** Short to medium term accommodation and case management support to families escaping DFSV

- **Keeping Women Safe In Their Homes (KWSITH) Program:** Federal funding to undertake risk assessments, safety planning and security upgrades to support women and children experiencing DFSV to remain in their homes.
- **Housing Support Program including CASY House:** Emergency accommodation shelter for young people aged 15-18 who are either experiencing, or at risk of, homelessness in Darwin and the Youth Accommodation and Support Service (YASS) (in partnership with Anglicare NT) for young people aged 15–24 years who are homeless or at risk of homelessness, with a strong focus on securing longer term housing.
- **Specialist DFV Counselling Program:** Offering specialist co-located counselling services at the DFVC for victim-survivors.
- **Amplifying Voices Program:** Engaging young women and gender diverse people with lived experience of DFSV to lead advocacy and influence systems reforms through primary prevention activities, across the Territory.

As a trusted NT government partner, YWCA's extensive suite of community programs receive the following government support:

Program Name
Amplifying Voices
Connected Families
Domestic Family Violence Centre (DFVC)
DFVC - National Partnership Agreement
Keeping Women Safe In Their Homes
CASY House
Housing Support Program
Tenancy Sustainability and Support Program (commencing 2025)
Home Safe NT (commencing 2025)
Lived Experience and Advocacy Program (commencing 2025)
Medical Accommodation Program - Barbara James House
Medical Accommodation Program - Dr Helen Phillips Cottage

YWCA is appreciative of the Northern Territory Government's support in funding programs and services across the region. This investment enables us to provide critical services to women and families experiencing domestic, family, and sexual violence. However, as is the case nationally, current funding levels do not meet the scale of the demand. As highlighted in the Coroner's report, between 1 January and 15 May 2024, YWCA supported 155 people in our five safe houses and case

management outreach in Darwin and Palmerston. In that same period, we were unable to assist a further 250 people who sought our help.²

In her Coroner's report, Judge Armitage impresses the crucial role of housing and related service delivery to the domestic and family violence crisis in the Northern Territory [678]-[679]:

"I accept the evidence that I heard of the difficulty that Women's services experience in recruiting and training staff, particularly when the employees of these services are underpaid and over stretched. There is a strong and urgent need to address this through increased funding, and workforce planning.

I also note a related issue that was raised in evidence. Apart from the lack of sufficient crisis accommodation in women's refuges, there is generally a lack of accommodation options for people leaving their homes. I accept that there is a real need for medium to longer term transitional housing for women escaping domestic and family violence."

YWCA anticipates that the Government's **Refreshed Domestic, Family and Sexual Violence Framework** will be accompanied by increased investment in evidence-based, high demand services delivered by the sector which are life saving for women in the Northern Territory.

A Government Backed Response Proportionate to the Scale of the Crisis

YWCA calls on the Northern Territory Government to fully and meaningfully implement the recommendations of Coroner Elisabeth Armitage in the findings of the Coroners Court **Inquests into the deaths of Miss Yunupingu, Ngeygo Ragurk, Kumam Rubuntja and Kumanjayi Haywood** [2024] NTLC 14.

We acknowledge the expertise of Judge Armitage and the evidence provided by Aboriginal and Torres Strait Islander community representatives throughout the inquest. The evidence now before the government makes clear the scale of the domestic and family violence crisis in the Northern Territory. Data consistently shows that the rates of domestic, family and sexual violence in the Northern Territory are far higher than in any other Australian jurisdiction and are among the highest in the world. Women in the Northern Territory are seven times more likely to experience domestic and family violence than women elsewhere in Australia.

² Above n 1, 212 [675].

The impact on Aboriginal and Torres Strait Islander women is overwhelming. Aboriginal and Torres Strait Islander women are 40 times more likely to be hospitalised as a result of domestic, family, and sexual violence and are estimated to be 60 times more likely to be victims of domestic homicide than non-Aboriginal women. Of all sexual assault victims in the Territory, 91% are Aboriginal women and girls, with more than half under the age of 19.

The burden on systems is also overwhelming. Domestic, family, and sexual violence accounts for up to 80% of police time in the Northern Territory. Despite these pressures, underreporting remains significant. Even so, NT Police data records a 117% increase in DFSV reports over the past decade, with projections of a further 73% increase in the next ten years.

These figures reflect not only the scale of the crisis but also the urgent need for a government-backed response proportionate to its gravity. Meaningful, system-wide reform must be the Northern Territory Government's highest priority. The Coroner's report provides a clear and evidence-based roadmap, endorsed by the domestic, family, and sexual violence sector and Aboriginal and Torres Strait Islander advocates. Full implementation of its recommendations, embedded within the Refreshed Domestic, Family and Sexual Violence Framework, is essential to deliver the change women in the Northern Territory need and deserve.

Procedural and Implementation Considerations for the Framework

YWCA thanks the Northern Territory government for the opportunity to review and provide feedback to the draft **Refreshed Domestic, Family and Sexual Violence Reduction Framework 2025–2028** ('the Framework'). We engage in good faith with the government alongside other specialist providers across the domestic, family and sexual violence and homelessness sectors.

We note, however, that the current consultation mechanism (a short online survey available for less than three weeks) is not proportionate to the scale of the crisis. A process of this gravity requires proper engagement to ensure that future investment decisions are shaped by the informed expertise of the Territory's domestic, family and sexual violence sector.

YWCA urges that consultation be broadened and extended. We offer to work in partnership with the Department of Children and Families (DCF) and sector peers to co-design a more robust process that both reflects the urgency of the crisis and ensures that the Framework delivers lifesaving outcomes. Co-design would allow consultation and implementation to progress in parallel.

Recognise DFSV as Gendered Issue which Disproportionately Impacts First Nations women

YWCA notes that, compared with its predecessor; the **Domestic, Family and Sexual Violence Action Plan 2: Taking stock, evaluating and reviewing, and building on what works 2022 – 2025** ('Action Plan 2') that the draft framework provides less contextual detail. In particular, the Framework could be strengthened by more explicit acknowledgement that domestic, family and sexual violence is a gendered issue, and one which impacts Aboriginal and Torres Strait Islander women and children at higher rates. Action Plan 2 specifically addresses these factors at '2.2. The size of the problem':

'DFSV is a serious, prevalent and life-threatening problem. People of all ages and backgrounds, including children and older people, all cultural groups, all genders, all sexualities, and all abilities experience DFSV. However, the evidence is very clear that DFSV is strongly gendered, and that, in the Northern Territory and elsewhere, DFSV is predominantly, but not exclusively, perpetrated by men against women and children. Men can also be victim survivors of DFSV, with the significant majority of male victim survivors experiencing DFSV committed by other male family members.

...

While DFSV affects people across all population groups, the evidence shows that Aboriginal women and children experience disproportionate rates of violence, and that violence they experience is more severe and more complex in its impacts, as a result of the intersection between the multiple drivers of violence associated with gendered inequality, the ongoing impacts of colonisation, and systemic racism. Violence against Aboriginal women is perpetrated by both Aboriginal and non-Aboriginal men.'

The Framework could also be strengthened by incorporating the seven overarching principles from Action Plan 2 which provide a succinct and supportive framing. We note the first principle is women and children's safety and wellbeing at the centre.

YWCA recommends that this contextual depth be carried forward into the **Refreshed Framework**, as it will provide a stronger foundation for targeted investment, tailored responses and measurable progress.

Sector-Led Engagement and Oversight

YWCA notes the absence of a clear external accountability mechanism for the monitoring of the draft Framework. We welcome the proposal to establish a DFSV Partnership Forum but note this falls within the context of disbanding the former ICRO Domestic, Family and Sexual Violence Interagency Coordination and Reform Office (DFSV-ICRO or ICRO) and the Domestic, Family and Sexual Violence (DFSV) Advisory Forum, a key consultation body established under the Northern Territory government's 10-year Domestic, Family and Sexual Violence reduction strategy. We stand with the sector in calling for the reinstatement of the DFSV Advisory Forum.

The ICRO (CR 1) previously provided high-level oversight and inter-agency coordination, supported by five dedicated staff members from five different agencies. YWCA recommends establishing a cross-agency mechanism with the same level of resourcing as the ICRO to ensure effective coordination and accountability.

We note that the **Refreshed Framework** includes an accountability measure by way of 'a permanent DFSV coordination mechanism to lead consistent and evidence-based DFSV policy, practice, service delivery and system reform.' A re-instated DFSV Advisory Forum to advise on the co-ordination, implementation and assessment of the Framework is essential.

YWCA calls for the standard of this coordination mechanism to meet that of the **Coroner's Recommendation 1: Permanent DFSV-ICRO**, including the production of an annual report to be published online, including through a visual report card with relevant DFSV statistics and information about the implementation of the Coroner's recommendations and the progress of the Framework.

YWCA stands with the sector and the **Coroner's Recommendation 2** in calling for the **establishment of a DFSV peak body for the Territory**. This is crucial noting that the Northern Territory is the only Australian jurisdiction without a domestic and family violence peak and has the highest rates of domestic and family violence out of any Australian jurisdiction.

Review of Funding Allocations

YWCA notes that the Northern Territory government has put forward in the Framework pre-determined initiatives, with pre-determined allocations of government expenditure but insufficient detail for a full understanding of the validity of the initiatives and by extension the validity of the expenditure.

YWCA notes that the Northern Territory government is investing \$36 million in ongoing, annual funding allocated in 2025-2026, over a five-year period to 2029-2030. We recognise that this parallels Coroner's recommendation 33 in the call for at least \$180 million over five years, and ongoing funding of \$36 million per annum. It is important to note the context of this recommendation by the Coroner which is three-fold:

- This investment must be adjusted for inflation to account for the years since the DFSV-ICRO made its submission.
- This is the minimum investment called for.
- The investment is for the full implementation of Action Plan 2 (to be read with the associated Mapping Report) as developed and costed by the Domestic, Family and Sexual Violence Interagency Coordination and Reform Office (DFSV-ICRO).

We note that the investment amount, whilst welcome, has not been adjusted for inflation and is the minimum called for. Importantly, the investment amount was for the purpose of implementing Action Plan 2 and was costed by the DFSV-ICRO. We note that Action Plan 2 has passed, and this **Refreshed Framework** is unique to and departs from Action Plan 2 in several respects. Furthermore, the disbanding of the DFSV-ICRO and the absence of sector engagement in shaping the initiatives and funding allocations outlined in this budget are of concern. It is therefore critical that meaningful engagement with the domestic, family and sexual violence sector now takes place. This will ensure the sector is fully briefed on the proposed initiatives and able to provide informed advice to guide next steps and funding decisions.

YWCA acknowledges the criticality of the investment being distributed to the domestic, family and sexual violence sector and its Aboriginal Community Controlled Organisation representatives. This is essential towards meaningfully address the soaring rates of domestic, family and sexual violence in the Territory through measures which are evidence-based in alignment with the recommendations of the Coroner's report.

NT Police Co-Responder and Circuit Breaker initiatives – majority (40%) allocation of funding

We note in particular that the largest expenditures are for the DFSV Co-Responder model and the Circuit Breaker program. Together these two initiatives will absorb 40% of the \$36 million of ongoing annual funding distributed under this Framework which has 44 initiatives.

Whilst YWCA encourages a co-responder model, it is important that the DFSV sector is appropriately resourced to support this work and appropriately engaged in the design, delivery, and accountability for the outcomes of this initiative.

Whilst we encourage DFSV service supports and sector-led primary prevention programs for young people and children in the Northern Territory, we note that the second highest funded initiative under the current proposal is the Circuit Breaker initiative led by the Northern Territory government. We note that Circuit Breaker has been designed and is run by the Northern Territory government without the input of the specialist domestic, family and sexual violence sector.

Circuit Breaker is not classified as a domestic, family and sexual violence program by the sector. As outlined by the Northern Territory government, Circuit Breaker is a youth diversion program with a focus on young people at risk of entering the youth justice or child protection system composed of intensive case management by the Department of Children and Families child protection staff, a return of young people by DCF or police to their homes or a safe place to sleep, and patrolling of the streets of Alice Springs and Darwin for young people over the weekend.³ The fact that Circuit Breaker is not a DFSV program for young people is reflected by YWCA's understanding that in the last verbal report provided by relevant Alice Springs services that no referrals had been made from Circuit Breaker to a local specialist DFSV or men's behaviour change program.

YWCA notes the position within the Framework that whole-of-government coordination is required to deliver the Framework and achieve meaningful, system-wide change (p 15). We strongly emphasise however that increased and sustained investment must flow directly to the domestic, family, and sexual violence sector. Funding allocations directly primarily to policing cannot substitute for investment in frontline and specialist services that prevent violence and support victim-survivors.

We therefore recommend that Treasury reconsider both the source and allocation of funds to ensure they are commensurate with program outcomes. This includes opening additional funding envelopes across Northern Territory Government portfolios so that each jurisdiction contributes to the DFSV response within its remit, with resources directed to the sector best placed to deliver impact.

DFSV Specialist Services Funding

YWCA welcomes the proposed funding uplift of \$5.2 million for the specialist DFSV sector. However, we submit that this should be the highest investment within the funding packet on an ongoing basis. With new investments across multiple programs, there will be an increase in screening and referring and therefore additional pressures on the DFSV services sector.

One important measure that we call for from the Northern Territory Government is to rescind its position not to support the indexation of grant funding for frontline

³ Northern Territory Gov

DFSV services in line with real cost-of-living increases. If indexation is not properly funded, baseline funding will not be sustainable.

YWCA notes the evidence provided by the organisation's Regional Manager in the Northern Territory, Rachael Uebergang on the disruptive effects of late or retrospective indexation and the imposition of "efficiency dividends" upon the budgetary planning of community service organisations.

As explained by Rachael Uebergang to the Coroner:

"It is essential for budget preparation work in community services organisations to know prior to the commencement of a financial year, what funding is available. Knowing what indexation payment might be forthcoming, including whether indexation is an increase or decrease in funding, is an essential component of this. On 29 December 2022, some of our services were provided with 36 months of indexation funding and informed that the 36 months of indexation funding was to be expended by 30 June 2023. Such a late payment of indexation, with the requirement to expend over a short period of six months, does not facilitate thoughtful, consistent and reliable service delivery."

The impacts of lack of funding are tangible with the rates of 'unassisted' domestic and family violence clients seeking support increasing by 54% for YWCA in the Northern Territory from 2023-24 to 2024-25. This increase in demand cannot be met without a real increase in service funding to essential domestic, family and sexual violence services.

YWCA stands with the sector in calling for the Northern Territory Government to implement the **Coroner's recommendations 34 and 35.**

Recommendation 34: **Increase to core funding**

The Northern Territory Government should increase the baseline funding for frontline DFSV crisis services (for example but not limited to safe houses, outreach support for women and children experiencing DFSV; counselling and healing services) by a figure in the order of 10%, to address the quantified lack of core funding which results in unmet need.

Recommendation 35: **Indexation**

With respect to frontline DFSV services, the Northern Territory Government guidelines should be amended so that grant funding terms and conditions explicitly include indexation that is commensurate with real cost of living increases, and

ensure those services are exempt from (what are referred to by the Government as) “efficiency dividends” and “budget measures”.

Remote Women’s Safe Houses

Despite the significant role that risk of homelessness and housing insecurity plays for women experiencing domestic, family and sexual violence and the severe shortage of housing options for women in these situations, one of the lowest funded initiatives in the \$36 million allocation is Remote Women’s Safe Houses, attracting less than \$250,000 of ongoing funding. This is compared to the almost \$15 million to the top two aforementioned initiatives.

Whilst we acknowledge the initiative to transition remote Women’s Safe Houses to providers in remote locations, this should be coupled with additional funding to sustain those houses and to expand the level of housing, across the housing spectrum of crisis to medium and long-term housing, for women at risk of domestic and family violence in the Northern Territory.

YWCA notes the acknowledgement that insufficient funding will further reduce the already limited safe housing supports available to women in the Northern Territory experiencing domestic and family violence, including those whose lives are at risk. This is evident in the Framework’s targets, where the projected number of bed nights in Women’s Safe Houses and the future target for safety plans created or updated are set below the current baseline.

In effect, the Framework is planning for fewer vital housing services for Territorian women, with only a minor allocation of funding directed towards remote Women’s Safe Houses. YWCA is concerned by this approach and the consequences it will have for women’s safety, wellbeing, and survival in the Northern Territory. Sustained and increased investment in safe housing is critical to reducing the rates of domestic, family, and sexual violence.

Other Considerations

Beyond the two most resourced initiatives, the least resourced initiatives which are proposed to receive funding on an ongoing basis (less than \$500,000 per year) are the specialist DFV responses, primary prevention programs and community activities.

We separately note the absence of a commitment to progressing the commitment under Action Plan 2 to implement Respect @ Work, specifically to implement the recommendations from the National Inquiry into Sexual Harassment in Australian Workplaces Report and to shift from a reactive complaints-based system to a proactive approach of preventing sexual harassment at work. It is essential that

everyone in the Northern Territory, including workplaces, are working to create safety and to end sexual violence in the jurisdiction.

Lived Experience Co-Design & Housing, Homelessness and DFV Pathways

YWCA applauds the Northern Territory Government for its focus on the importance of lived experience co-design and the intersections between housing, homelessness and domestic and family violence. We note in particular initiatives No. 21: Housing Pathways, No. 27: DFSV Service Hub and No. 35 Housing, Homelessness and DFV pathways.

We note the valuable role that YWCA can play in the design and roll-out of these initiatives given our lived experience Amplifying Voices program and our position as the leading voice on gender-responsive solutions to address housing insecurity, homelessness and domestic and family violence.

Housing Pathways

YWCA offers our expertise and partnership in this work. Specifically, we note that we are currently investigating the daytime needs of women and children in the Northern Territory who are experiencing homelessness. YWCA has a head-leasing approach for women and gender-diverse people, with priority allocations for victim-survivors of DFSV.

YWCA offers to extend our expertise to the Northern Territory Government in relation to our piloting of an Australian sector-first model called the [Women's Housing Framework](#). This framework identifies best practice approaches to designing, acquiring, and operating housing for women. Based on findings taken from women-centred literature and learnings from those with lived experience of housing insecurity and homelessness, the Framework outlines small changes an organisation can make to ensure they are working with residents to support them in achieving positive housing and individual outcomes linked to broader gender equality outcomes.

The Framework operates in tandem with our [Women's Liveability Assessment Tool](#), a free online audit tool that helps community housing providers, governments and other housing providers to ensure their housing meets the unique needs of their women residents; as well as, our [Gender Responsive Design Guidelines](#) which describe key design and operational principles for social and affordable housing for women and are available for use by community housing providers, government

agencies, peak bodies and property development professionals including architects, planners and builders.

DFSV Service Hub

YWCA acknowledges the concept of a central service hub to support victim-survivors of domestic, family, and sexual violence.

For such a hub to be effective, it must be underpinned by adequate resourcing and, most importantly, be genuinely co-designed with the DFSV sector from the outset. Co-design will ensure that the hub is safe, accessible, and integrated with existing service delivery, rather than operating only as an intake point.

Embedding lived experience engagement throughout the design and operation of the hub, as well as other Northern Territory initiatives, will be essential to best practice. YWCA emphasises that co-design with the sector is the first and most critical step to ensure the hub delivers meaningful support for Territorian women and children.

More Comprehensive and Meaningful Targets

YWCA notes that the Northern Territory Government has put forward in the Framework partial targets to track the implementation and success of the initiatives. However, there is a significant absence of targets across the Framework and where the targets do exist, they are generally equal to or in some cases worse than the current baseline data points of domestic, family and sexual violence in the Northern Territory. YWCA as such interprets the purpose of the \$36 million annual investment to stop the increase in rates of violence but not to reduce the rates of violence.

We acknowledge that should there be an increase in DFSV awareness and police services, that there may be higher reported rates of domestic, family and sexual violence reports. We are concerned, however, that the only target listed is for a short-medium term increase in Northern Territory victimisation rates, without long-term targets for victimisation rates to be reduced or proportionate funding to the specialist domestic, family and sexual violence sector to support referrals.

The lack of targets to reduce the rates of domestic, family and sexual violence in the Northern Territory is concerning given the guarantee that according to the status quo many more women's lives will be taken and impacted by men's violence, particularly the lives of First Nations women and girls in the Northern Territory. The lack of targets also shows the need for the Northern Territory government to engage robustly in co-design, implementation and monitoring with the specialist domestic, family and sexual violence sector and to take further measures to fully and meaningfully implement all recommendations of the Coroner's report from the

Inquests into the deaths of Miss Yunupingu, Ngeygo Ragurk, Kumarn Rubuntja and Kumanjayi Haywood [2024] NTLC 14. We also note the importance of the targets aligning with and supporting **Closing the Gap**, in particular the Outcome 13: Aboriginal and Torres Strait Islander families and households are safe.

Overarching Recommendations

YWCA Australia provides a line-by-line position on the detailed deliverables for the Northern Territory government in the below table. We have also outlined recommendations above regarding improvements to process, design, implementation, measurement and accountability.

For ease of reference, the overarching recommendations of YWCA Australia are:

- I. Engage in robust consultation with the specialist domestic, family and sexual violence sector in the design, delivery and monitoring of the Framework, including the determination of initiatives; allocation of funding; and targets to measure and monitor implementation success.
- II. Reinstate and fully fund the operations of the Domestic, Family and Sexual Violence Interagency Coordination and Reform Office (DFSV-ICRO or ICRO) and the Domestic, Family and Sexual Violence (DFSV) Advisory Forum.
- III. Ensure the Framework includes the contextualisation of recognising the domestic, family and sexual violence as a gendered issue in the Northern Territory, and one that disproportionately impacts First Nations women and children.
- IV. Ensure that the \$36 million ongoing funding supports the full and proper implementation of the Coroner's recommendations, including recommendation 34 to increase core funding by 10% and recommendation 35 to include indexation commensurate to real cost of living increases in funding.
- V. Increase funding for remote women's safe houses and ensure that the Northern Territory government is taking strides to increase crisis accommodation as well as social and affordable housing for women and their children who are victim-survivors of domestic, family and sexual violence.
- VI. Allocate new funding to initiatives which are to be designed and delivered by Aboriginal Community Controlled Organisations and/or to support the Aboriginal and Torres Strait Islander workforce noting the disproportionate rates of DFSV against First Nations women and children and the evidence-based importance of First Nations-led and community-based responses.

VII. Partner with YWCA Australia, and our lived experience group Amplifying Voices, on initiatives numbers 21, 27 and 35.

Draft Deliverables – YWCA Australia’s Reflections

We applaud the Northern Territory government for including a detailed deliverables document within the Framework. YWCA Australia’s recommendation is that the deliverables document must be retained in the finalised Framework. To ensure monitoring, evaluation and accountability and oversight, YWCA Australia recommends that the six-monthly report against the detailed deliverables is an essential component. This process should follow the accountability process of the Action Plan 2 bi-annual reports. The evaluation process must lean on the assessments and consultations of the domestic, family and sexual violence sector in the Northern Territory, including Aboriginal Community Controlled Organisations and community experts.

YWCA Australia has reviewed the 44 initiatives in the deliverables document and provided a line-by-line statement of our position and recommendations to the Northern Territory government, as reflected in the following pages.

YWCA Australia extends the opportunity for ongoing engagement and consultation on this submission, and the Framework and its implementation, with the Northern Territory Government. We seek to work with the Territorian Government and broader sector to arrest and reverse the chronic rates of violence and homelessness against women and children, particularly Aboriginal and Torres Strait Islander women and children in the Northern Territory. Moreover, to prevent the ongoing and preventable loss of lives in the Territory.

For engagement and consultation on this submission, and the Framework and its implementation, please reach out to YWCA’s General Manager, Northern Territory, Rachael Uebergang at rachael.uebergang@ywca.org.au and YWCA’s Advocacy and Campaigns Advisor, Bianca Tini Brunoizzi at bianca.brunozzi@ywca.org.au.

YWCA Australia’s Commentary on the Draft Framework Deliverables

Domain	#	Title	Initiative	YWCA Australia's Position
Primary Prevention	1	Primary Prevention grants	Continue to support and evaluate community-led primary prevention projects that challenge and change social and cultural attitudes, practices and structures that underpin DFSV, including those led by ACCOs. Responds to CR30	No 1: Further detail required, including: <ul style="list-style-type: none">Which projects will be evaluated and does this extend to an evaluation of all funded Safe, Respected and Free From Violence Activities?How does DCF plan to undertake these evaluations in FY26?Will principles of self-determination and Indigenous data sovereignty be upheld in respecting the contribution of ACCO leadership for primary prevention?
	2	Primary Prevention activity in schools	Implement and evaluate culturally appropriate and whole of school respectful relationships education (RRE) programs in educational settings. By the end of 2025, complete the RRE implementation package through evaluation of the trial phase with a cross section of schools, representative of different regions, phases and settings. The case studies and feedback from the trial phase will inform any amendments to the RRE implementation package. From 2026, all schools are required have RRE implementation plan using a whole school approach. Responds to CR30	No 2: <ul style="list-style-type: none">Evaluation must include the number of students who have completed the RRE.Efforts must be made in alignment with CR30 to reach all children and young people, including those in remote areas where DFSV rates are highest and who are not in regular attendance at school. These efforts must include wider media and social media.The ongoing investments of 0.25 mil are in our view inadequate to meet the need for full implementation of CR30.
	3	Community Activities and Events to raise DFSV awareness	Support activities that raise awareness about DFSV and contribute to the prevention of gender-based violence in the NT community, including through addressing the drivers.	No 3: YWCA Australia acknowledges the importance of community activities and events to raise DFSV awareness need to be provided. Further details are required to be shared with the specialist DFSV sector around the deliverable; the proposed activities; and to what extent those activities will be funded.
	4	Primary Prevention capability building	Support the NT Primary Prevention Community of Practice and the Our Watch Primary Prevention Officer Partnership to increase prevention capability across the NT.	No 4: YWCA Australia supports the continuation of this investment.
	5	DFSV intersections with disability and elder abuse	Strengthen the support provided by disability and seniors specialist services to respond to DFSV and abuse experienced by older people and people with disability.	No 5: YWCA Australia acknowledges the importance of support provided by disability and seniors specialist services to respond to DFSV and abuse experienced by older people and people with disability. Further details are required to be shared with the specialist DFSV sector around the deliverable; the proposed activities; and to what extent those activities will be funded.
Early intervention and accountability	6	Circuit Breaker	Develop and implement a program that focusses on early interventions for young people who are impacted by or at risk of DFSV (as victim survivors and/or users of DFSV), consistent with RAMF and Safe and Together, to provide intensive support for young people and their families to address DFSV and support safety, healing, accountability and behaviour change. Responds to CR15	No 6: Recommendation that the Circuit Breaker program be funded through the child protection budget, as it is not a specialist DFSV service. This is reflected in the last verbal report provided by relevant Alice Springs services that no referrals had been made from circuit breaker to a specialist DFSV or men's behavior change program. Recommendation that there is a transparent and external evaluation of the Circuit Breaker program's purpose, operations, and success. This is critical given the Circuit Breaker program is currently to be resourced the second largest funding allocation, absorbing almost 20% of the \$36 million investment as a program which has not been designed with the input or review of the DFSV sector.
	7	Co-Responder model	Implement and evaluate the Alice Springs DFV Co-Responder model, and expand the model to Darwin, Katherine, Tennant Creek and a remote location. (The Co-Responder model commenced in Alice Springs in 2024 and involves specialist DFV practitioners for victim survivors and for people committing DFV working alongside police and child protection to provide early intervention after the initial police response to DFV incidents). Responds to CR7	No 7: YWCA Australia supports the expansion of the co-responder model. However, it must be noted that in Darwin specialist DFSV services are already under pressure and have a large number of 'unassisted' clients. Should co-responder intervention result in an increase in referrals to specialist services, the specialist services will require an increase in resources to meet the demand (as they indeed already do). The funding allocated should be distributed directly to the specialist DFSV services which will be providing the co-responder support. This is critical given the DFSV Co-Responder initiative is

				currently to be resourced as the largest ongoing funding allocation, with the NT Police and the DCF as the lead agencies.
	8	Early Intervention grants	Evaluate the Early Intervention Grants program established in 2022, that supports young people who are starting to use violence and aims to change the trajectory through a therapeutic approach, and explore options to continue the program.	YWCA Australia notes and supports the extension of CR7 that the NT Government should give consideration of NT Police partnering with Aboriginal Community Controlled Organisations to develop a community-led co-responder model to incidents of domestic and family violence in remote NT communities. No 8: YWCA Australia is unable to identify any early intervention grants funding in the Roadmap – outside of the child protection Circuit Breaker program which has been designed in a silo from the sector by the NT government. YWCA Australia recommends that distinct funding is allocated for evidence-led early intervention grants for the specialist DFSV sector, with priority pathways for ACCOs.
	9	Alcohol intervention	Develop a draft Roadmap to Tackling Problem Drinking, which will incorporate strategies to balance alcohol availability and demand and include measures to reduce DFSV harm connected to alcohol. Responds to CR5	No 9: YWCA Australia acknowledges the importance of measures to reduce DFSV harm connected to alcohol. Further details are required to be shared with the specialist DFSV sector around when the Roadmap to Tackling Problem Drinking will be completed; who the NT Government and Department of Health with consult within relation to the Roadmap; and what the outcomes of the Roadmap are intended to be.
	10	Alcohol and other drugs (AOD) rehabilitation	Implement AOD rehabilitation and treatment options which will incorporate DFSV behaviour change strategies through a social and emotional wellbeing (SEWB) framework including: <ul style="list-style-type: none"> increasing investment in AOD rehabilitation services, including outpatient care ambulatory care, respite and behavioural change services; delivering compulsory alcohol treatment options for prisoners and people on remand; and increasing community-based alcohol treatment options, including targeted, short-stay and day programs. Responds to CR6	No 10: Outside of YWCA Australia’s area of expertise.
	11	DFV Audit Team	Fund and expand the DFV Audit team within NTPF, to ensure the best possible police responses to DFV incidents are provided in all locations across the NT. Responds to CR13	No 11: Difficult to comment without understanding how this could be funded from existing resources with the view to expanding across the Territory.
	12	Community-based approaches to child welfare	Continue to develop, support and evaluate placed-based models that support child wellbeing and safety, in partnership with ACCOs where possible. Responds to CR16	No 12: Very welcome. Recommendation that this receives additional funding.

Domain	#	Title	Initiative	YWCA Australia’s Position
Early intervention and accountability	13	Continue prison-based programs for people who have committed DFV	Continue expanded delivery of the RAGE Program within prison to prisoners with 12+ months to serve, increasing program accessibility, and expanded delivery of Family Violence Program to prisoners on remand. Responds to CR23,24	No 13: Very welcome to enable access to RAGE for prisoners with 12+ months rather than 24+ months. It appears the extension of the family violence program to people on remand is a positive step, people on remand have missed out on any programs or rehabilitation to date. YWCA does not have visibility over the family violence program however and can't comment on its efficacy. This does however not appear to address CR24 regarding access to counselling. We note the particular importance of ensuring that programs that engage with people who have committed DFV are evidence-based to reduce and eliminate risk of collusion or emboldening the actions of persons who have a history of using violence.
	14	Develop new prison based	Develop and deliver new culturally safe offender programs, including for deniers, to address DFSV reoffending and support a safer community.	No 14: Very welcome. YWCA Australia recommends having a time frame attached for its implementation.

		DFV programs	Responds to CR23, CR25	We note again the particular importance of ensuring that such programs are evidence-based to reduce and eliminate risk of collusion or emboldening the actions of persons who have a history of using violence.
	15	Men's community-based behaviour change programs	Stabilise increased funding for existing men's behaviour change programs, expand programs into additional locations where possible (including remote communities according to identified need), implement program standards, and evaluate programs. Responds to CR29	No 15: Very welcome. The evaluation is essential, and YWCA Australia's recommendations is for the evaluation to go further than a process evaluation. There needs to be an evaluation of whether the programs are shifting behaviour. We note that the National Partnership Agreement ('NPA') funding is short term and piecemeal, whilst NPA funding is welcomed, reliance on NPA funding will not stabilise increased funding. Additional funding by the NT government for this work is recommended. We note again the particular importance of ensuring that such programs are evidence-based to reduce and eliminate risk of collusion or emboldening the actions of persons who have a history of using violence.
	16	Community based programs for men (in addition to MBCP)	Support community driven programs for men that assist in primary prevention and early intervention of DFSV. Responds to CR29	No 16: Declaration that this responds to CR29. However, CR29 calls for increased funding and this action is funded through existing resources. In line with the Coroner's Report recommendation, YWCA Australia supports the recommendation for additional funding. We note again the particular importance of ensuring that such programs are evidence-based to reduce and eliminate risk of collusion or emboldening the actions of persons who have a history of using violence.
Response, Recovery and Healing	17	Specialist DFV Court	Continue the Specialist DFV Court at the Alice Springs Local Court and expand the model to 2 more sites from in 2027-28. This includes a registrar, legal support services, non-legal support services and training for judges. Responds to CR17	No 17: Very welcome however Action Plan 2 identified that the specialist court would be evaluated. YWCA Australia recommends that the evaluation should be published and considered prior to further expansion.
	18	Specialist DFV Prosecution and Witness Support	Continue the Specialist DFV Prosecution and Witness Support additional staff.	No 18: Very welcome.
	19	Frontline DFSV crisis and wraparound services	Increase and consolidate sustainable baseline funding and Enhanced Specialist Service Grant funding for DFSV victim survivor crisis accommodation and wraparound responses (including outreach, counselling, children's support, Flexible Support Packages), as well as supervision, practice management support and RAMF implementation. Develop DFV practice and service standards to support service-driven quality improvement, including an implementation process, in partnership with specialist services. Standardise a sustainable, efficient and accountable investment model for specialist DFSV services as part of an integrated system response. Responds to CR34	No 19: YWCA Australia calls for a full and proper implementation to CR34 and CR35. YWCA Australia notes that this initiative responds to CR 34 that the NT Government should increase the baseline funding for frontline DFSV crisis services (for example but not limited to safe houses, outreach support for women and children experiencing DFSV; counselling and healing services) by a figure in the order of 10%, to address the quantified lack of core funding which results in unmet need. YWCA Australia notes that CR 35 was previously rejected by the Northern Territory government. We refer to our earlier comments regarding the current under investment in the domestic, family and sexual violence sector and the need for funding to include indexation which is in line with real cost of living increases. If indexation is not properly funded, baseline funding will not be sustainable. The impacts of lack of funding are tangible with the rates of 'unassisted' domestic and family violence clients seeking support increasing by 54% for YWCA Australia in the Northern Territory from 2023-24 to 2024-25This increase in demand cannot be met without a real increase in service funding to essential domestic, family and sexual violence services like YWCA Australia in the Northern Territory.
	20	Remote WSH infrastructure and transition to community-	Support the improved amenity and transition of remote Women's Safe Houses (WSHs) to providers in remote locations	No 20: Very welcome. However, the funding of less than \$250,000 per year on an ongoing basis is insufficient. YWCA Australia refers to our recommendation for significant increased investment into Women's Safe Houses and all social and affordable housing across the medium to long-term housing spectrum as a critical infrastructure investment to prevent and arrest the rates of domestic, family and sexual violence.

		based providers		
	21	Housing Pathways	Continue the DFSV Housing Pathways Transitional Accommodation program to support DFSV victim survivors through a head-leasing approach with specialist DFSV supports and implement evaluation recommendations.	<p>No 21: Welcome. YWCA Australia offers our expertise and partnership in this work. Specifically, we note that we are currently investigating the daytime needs of women and children in the Northern Territory who are experiencing homelessness. YWCA has a head-leasing approach for women and gender-diverse people, with priority allocations for victim-survivors of DFSV.</p> <p>YWCA offers to extend our expertise to the Northern Territory Government in relation to our piloting of an Australian sector-first model called the Women's Housing Framework. This framework identifies best practice approaches to designing, acquiring, and operating housing for women. Based on findings taken from women-centred literature and learnings from those with lived experience of housing insecurity and homelessness, the Framework outlines small changes an organisation can make to ensure they are working with residents to support them in achieving positive housing and individual outcomes linked to broader gender equality outcomes.</p> <p>The Framework operates in tandem with our Women's Liveability Assessment Tool, a free online audit tool that helps community housing providers, governments and other housing providers to ensure their housing meets the unique needs of their women residents; as well as, our Gender Responsive Design Guidelines which describe key design and operational principles for social and affordable housing for women and are available for use by community housing providers, government agencies, peak bodies and property development professionals including architects, planners and builders.</p>
	22	DFSV counselling and healing for women prisoners	Continue to deliver trauma-informed DFSV counselling and healing for women prisoners.	No 22: Welcome. However, we call for whole-of-government funding towards the reduction of domestic, family and sexual violence and recommend that this program be funded through the Department of Corrections. This is in accordance with the principle that DFSV should be the business of all government agencies and that agency participation in this work should not be contingent upon or take away from the provision of specialist DFSV funding.
	23	After hours and other specialist DFSV responses in health	Increase the reach and capacity of the health system to recognise, respond to and refer DFSV victim survivors and those at risk through an afterhours specialist DFSV response. Improve and increase DFSV screening across NT Health settings with priority areas identified and targeted, supported by staff training. Review existing mandatory reporting policies and ensure NT Health staff are aware of their obligation to report relevant DFSV incidents. Responds to CR27	<p>No 23: We welcome an increased focus on these activities. We particularly recognise the afterhours specialist DFSV response and note that it is not unreasonable to fund this from the additional \$36 million for specialist services.</p> <p>We note, however, that NT Health screening and mandatory reporting is the core business of the NT Health, and the requirement to mandatorily report has been in place for more than 10 years. In light of this, YWCA Australia's recommendation is that funding to improve and increase these activities are funded through NT Health. This is in accordance with the principle that DFSV should be the business of all government agencies and that agency participation in this work should not be contingent upon or take away from the provision of specialist DFSV funding.</p>
	24	Specialist sexual assault responses	Establish Aboriginal-led community-based specialist sexual assault service(s) to build local and regional capacity, and commission culturally- designed sexual assault services including cultural healers, social emotional wellbeing workforce, counsellors and other trauma-based experts.	<p>No 24: Very welcome. We invite further detail regarding which regions will have these services and when they will be established.</p> <p>We note that with all the activities proposed to be Aboriginal-led community based that it is reliant on existing resources. The initiative will have NT Health as the lead agency. We invite further detail regarding whether the funding will draw from existing DFSV service resources or NT Health resources. We recommend a new investment of funding, which is ongoing and reliable for this specialist sexual assault responses project.</p>
	25	Multi-Agency Protection Service (MAPS)	Draft a proposal outlining how a MAPS could be established in the NT, linking to the co-responder model and aligned with FSF processes. Responds to CR9	No 25: Welcome. Integration and coordination are key to the success of DFSV reduction work. We invite further information as to when this work will be completed and what consultation will take place with specialist DFSV services like YWCA Australia.

	26	Family Safety Framework (FSF)	Continue to strengthen the FSF - the NT's integrated, multi service response for people at risk of serious harm or death because of DFV. Address funding cliffs for FSF coordination and intelligence support staff, support FSF Induction, and develop a stand-alone FSF Portal to improve administration and reporting. (Comprises permanent FSF Coordinator, permanent intelligence officers (IO) for Nhulunbuy and Wadeye, maintaining AO4 level IOs).	No 26: Very welcome. We note, however, that the portal was a feature of Action Plan 2. We invite further information regarding the delays to implementing the portal and details on when this initiative will be completed.
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Domain	#	Title	Initiative	YWCA Australia's Position
Response, Recovery and Healing	27	DFSV Service Hub	Explore the feasibility of a single point of contact for Territorians to access core DFSV services through a streamlined mechanism that makes it easier for people to get the help they need, to be co-designed with sector and lived experience representatives.	<p>No 27: YWCA Australia notes that our lived experience advisory group in the Northern Territory, Amplifying Voices has presented the concept of a central services hub to support victim-survivors of domestic, family and sexual violence.</p> <p>It is noted that no new investment would be made towards the service hub, relying instead on existing resources. To be effective it is essential that adequate resources are invested into the DFSV Service Hub.</p> <p>It is essential that those resources are allocated to ensure that the Hub is genuinely and meaningfully established through a process of co-design and that safety of the location and Territorians attending the location is paramount. It is important that appropriate structures and strategies are put into place to support lived experience engagement as a through line for the Service Hub (and other NT initiatives) as best practice.</p> <p>The Service Hub must be more than an intake hub and instead must be a point of real service delivery and connection with sector supports for Territorians experiencing domestic, family and sexual violence.</p> <p>Amplifying Voices and YWCA Australia extends the offer of ongoing engagement to ensure that the DFSV Service Hub is meaningfully co-designed to provide life-changing supports for Territorian women and children.</p>
Systemic Enablers and Reform	28	DFSV Workforce Capability - DFSV Training and Resource centre	Establish a centralised structure for developing, brokering, delivering, and coordinating DFSV training and workforce support across the NT. Ensure RAMF training is delivered regularly across the NT, for universal, statutory and specialist workers.	No 28: Welcome. YWCA Australia looks forward to the Resource Centre initiative coming to fruition. We recommend that an investment of more than \$1 million per annum on an ongoing basis as the preferred investment.
	29	DFSV Workforce Capability – qualifications	Work with local training providers to increase access to suitable qualifications for DFSV workforce, in order to support recruitment, retention and development of DFSV workers, including Aboriginal workers, local Territorians. Responds to CR3	No 29: Welcome. However, YWCA Australia also calls for an annual report regarding recruitment and retention which is an important element to the proper fulfillment of CR3.
	30	DFSV sector conference and policy officers	Support workforce and sector development through a biannual practice conference and sector policy officer(s).	No 30: We note that the bi-annual conference has been a Northern Territory government policy since 2019. However, only 2 conferences have been held (2019 and 2023 respectively). The Northern Territory government should ensure the conference is held bi-annually. We provide this feedback in acknowledgement of the significant successes of the conferences and the values that these conferences provided to the DFSV sector.
	31	RAMF Implementation – universal and specialist services	Support the implementation of RAMF and DFV understanding in universal services, including through RAMF Champions. Review and expand the RAMF to respond to worker needs.	No 31: We note that a review of RAMF was required under Action Plan 2 but not delivered. YWCA Australia's recommendation is that RAMF must be reviewed.
	32	RAMF Implementation - NTG	Implement the RAMF within relevant NTG agencies as part of their requirement as Information Sharing Entities prescribed under the DFV Act 2007 to align policies, procedures and tools, relevant to information sharing, with the RAMF. This requirement involves policy and process reform across all ISEs. Each agency is supported to develop a RAMF Implementation plan, which can include supporting RAMF training to identified staff, ensuring funded services align with the RAMF, align policy frameworks with RAMF, support staff.	No 32: Welcome.

	33	DFSV Research	Build DFSV research capacity in the NT. Invest in, partner and establish research projects on DFSV within the NT, to grow the evidence base and improve understanding of DFSV in the NT.	No 33: Welcome.
	34	DFV Death Review	Establish and implement a systemic DFV death review process for the NT to ensure that we learn from tragic deaths and jointly develop systems improvements to prevent future DFV-related harm and death.	<p>No 34: Extremely welcome. YWCA Australia notes that the Review was identified in Action Plan 2, and we invite further information on the timeline for the establishment and implementation of the DFV death review process for the NT. YWCA Australia strongly recommends that this process is prepared in consultation with the Aboriginal Community Controlled Organisation DFSV specialist sector representatives.</p> <p>YWCA Australia expresses concern that the funding source is to rely upon existing resources. We are concerned for the effectiveness of the Review and its appropriateness in relying upon Aboriginal and community experts without any provision for new investment. We call for a new investment to support the DFV Death Review which should be above the investments for other State and Territory jurisdiction DFV Death Review teams noting the disproportionately high rates of DFV in the Northern Territory.</p>
	35	Housing, Homelessness and DFSV intersections	Improve intersections between Housing, Homelessness and DFSV Policies and Programs. Align housing and homelessness reform strategies with DFSV prevention and response strategies, including RAMF, to improve the integrated response to the housing needs of DFSV victim survivors.	<p>No 35: YWCA Australia applauds the Northern Territory government for assigning a specific initiative to housing, homelessness and DFSV intersections recognising the essential importance to align housing and homelessness reform strategies with DFSV prevention and response strategies to improve the housing outcomes for DFSV victim survivors, and to act as a measure of safety and violence prevention for Territorian women, gender-diverse people and their families.</p> <p>YWCA Australia recommends a new investment of funding for this essential work, noting that Northern Territory has both the highest rates of DFSV and homelessness in Australia and that these rates are linked to the experiences of Territorian women, particularly First Nations women in the region.</p> <p>YWCA Australia extends the offer of consultation to the Northern Territory government to play an advisory role in supporting bridge the intersections between housing, homelessness and DFSV. This is from our unique role as a housing provider, specialist homelessness services provider, and domestic and family violence services provider in Australia and specifically in the Northern Territory.</p>
	36	Permanent DFSV Prevention mechanism for whole of system coordination	<p>Strengthen the whole of government DFSV coordination mechanism to lead consistent and evidence-based DFSV policy, practice, service delivery and system reform. Key activities include:</p> <ul style="list-style-type: none"> • Strengthen DFSV governance, including lived experience mechanisms • Lead and coordinate the development and implementation of strategic policy to improve the prevention of and response to DFSV • Working closely with government agencies and service providers, oversee the local coordination of efforts to address DFSV within each designated region across the NT • Oversee system performance and improvement • Effectively and efficiently manage grant funding to support initiatives that prevent and respond to DFSV • Coordinate monitoring, evaluation and accountability measures, including data analysis to support system development, and the publication of an annual report. <p>Responds to CRI</p>	<p>No 36: The ICRO (CR 1) previously provided high-level oversight and inter-agency coordination, supported by five dedicated staff members from five different agencies. YWCA recommends establishing a cross-agency mechanism with the same level of resourcing as the ICRO to ensure effective coordination and accountability.</p> <p>We note that the Refreshed Framework includes an accountability measure by way of ‘a permanent DFSV coordination mechanism to lead consistent and evidence-based DFSV policy, practice, service delivery and system reform.’ A re-instated DFSV Advisory Forum to advise on the co-ordination, implementation and assessment of the Framework is essential.</p> <p>YWCA calls for the standard of this coordination mechanism to meet that of the Coroner’s Recommendation 1: Permanent DFSV-ICRO, including the production of an annual report to be published online, including through a visual report card with relevant DFSV statistics and information about the implementation of the Coroner’s recommendations and the progress of the Framework.</p> <p>YWCA stands with the sector and the Coroner’s Recommendation 2 in calling for the establishment of a DFSV peak body for the Territory. This is crucial noting that the Northern Territory is the only Australian jurisdiction without a domestic and family violence peak and has the highest rates of domestic and family violence out of any Australian jurisdiction.</p>

	37	Monitoring, Evaluation & Accountability	Undertake rigorous monitoring, evaluation and accountability at the system and project level, including updated MEAP program logic and data matrix in collaboration with agency leads.	No 37: YWCA Australia notes the importance of sector, including ACCOs, being involved in the monitoring and evaluation of the Framework to ensure agency accountability.
	38	Aboriginal Interpreter Service (AIS)	Increase investment in the AIS (funding, training, and support) and develop a plan to attract, train, and retain interpreters, to support improved communication for people experiencing DFSV interacting with government systems. Responds to CR4	No 38: Welcome.
	39	Aboriginal Liaison Officers (ALOs) in hospitals and clinics	Review the remuneration and supports for ALOs in hospitals in recognition of their unique expertise and the crucial cultural role they provide for clients and staff with DFSV. Responds to CR28	No 39: Welcome.
	40	Interpreters and/or Aboriginal Liaison Officers (ALOs) in Joint Emergency Services Communications Centre (JESCC)	Employ interpreters and/or ALOs in JESCC to assist more effective communication and improve training for JESCC call takers to use interpreters, to improve outcomes for DFSV victim survivors. Responds to CR10	No 40: Welcome. However, again we note that only existing resources are assigned to this initiative. YWCA Australia calls for a proper and new investments into the initiatives that are to directly engage the Aboriginal and Torres Strait Islander workforce, and which are direct to supporting address the disproportionate rates of domestic, family and sexual violence against First Nations women and children in the Northern Territory.

Domain	#	Title	Initiative	YWCA Australia's Position
	41	Prevent, Assist, Respond (PART) training for NT Police	Deliver PART and other specialised DFV training to current NT Police Officers, auxiliaries, new recruits, and JESCC staff. Responds to CRT1, CR12	No 41: Feeback regarding PART training is excellent, we welcome the continuation of the training. We note that the funding source for this initiative is listed as existing resources. We invite further clarity on the funding source for PART, and note that without adequate funding from the NT government that this action will not fully implement CR 11.
	42	Permanent NT Police DFSV Command	Appropriately resource the DFSV Command in Alice Springs and Darwin headed by an Assistant Commissioner, with permanent DFSV positions. Ensure that priority is given to continuity of DFSV staff, with guidelines, policies and procedures amended (in consultation with the current Command and NGO sector). Establish a training unit within the DFSV Command, with staff whose role includes liaising with PART coordinator to ensure delivery is occurring as planned; incorporating into training lessons from DFV Audit Team; and ensuring NT Police are aware of best practice DFSV responses. Responds to CR12	No 42: Very welcome.
	43	SupportLink	Review SupportLink and enhance the training provided to police in relation to making SupportLink referrals. Responds to CR8	No 43: Very welcome, though it is noted that reviewing SupportLink has been on the agenda for many years. As SupportLink will be used for the SHS central intake system, a review should be fast tracked so that problems with SupportLink referrals are not replicated amongst SHS services (noting that many SHS users are impacted by DFSV). The experiences of YWCA Australia staff with difficulties associated with Support Link include: <ul style="list-style-type: none"> Inconsistency of referrals from Police. Some referrals provide detailed information, and others provide minimal information Not all referrals include contact information Incorrect referrals - wrong target group Police not always informing the person that they will be referring to Support Link which causes issues around call safety and barriers to actioning referrals due to fears of making the situation more unsafe for the DFSV victim.
	44	Safe and Together Framework audit	Conduct an audit of the implementation of the Safe and Together Framework, to ensure that the roll out has been effective. Responds to CR14	No 44: Welcome.

Agency acronyms: Department of Children and Families (DCF), Northern Territory Police Force (NTPF), Attorney-General Department (AGD), Department of Public Prosecutions (DPP), Department of Housing Local Government and Community Development (DHLGCD), Department of Corrections (DoC), Department of Education (DET), Department of People Sport and Culture (DPSC).

Where an initiative responds directly to a recommendation from the [2024 NT Coronial Inquiry](#) these are indicated by the code CR (Coronial Recommendation) and the recommendation number.