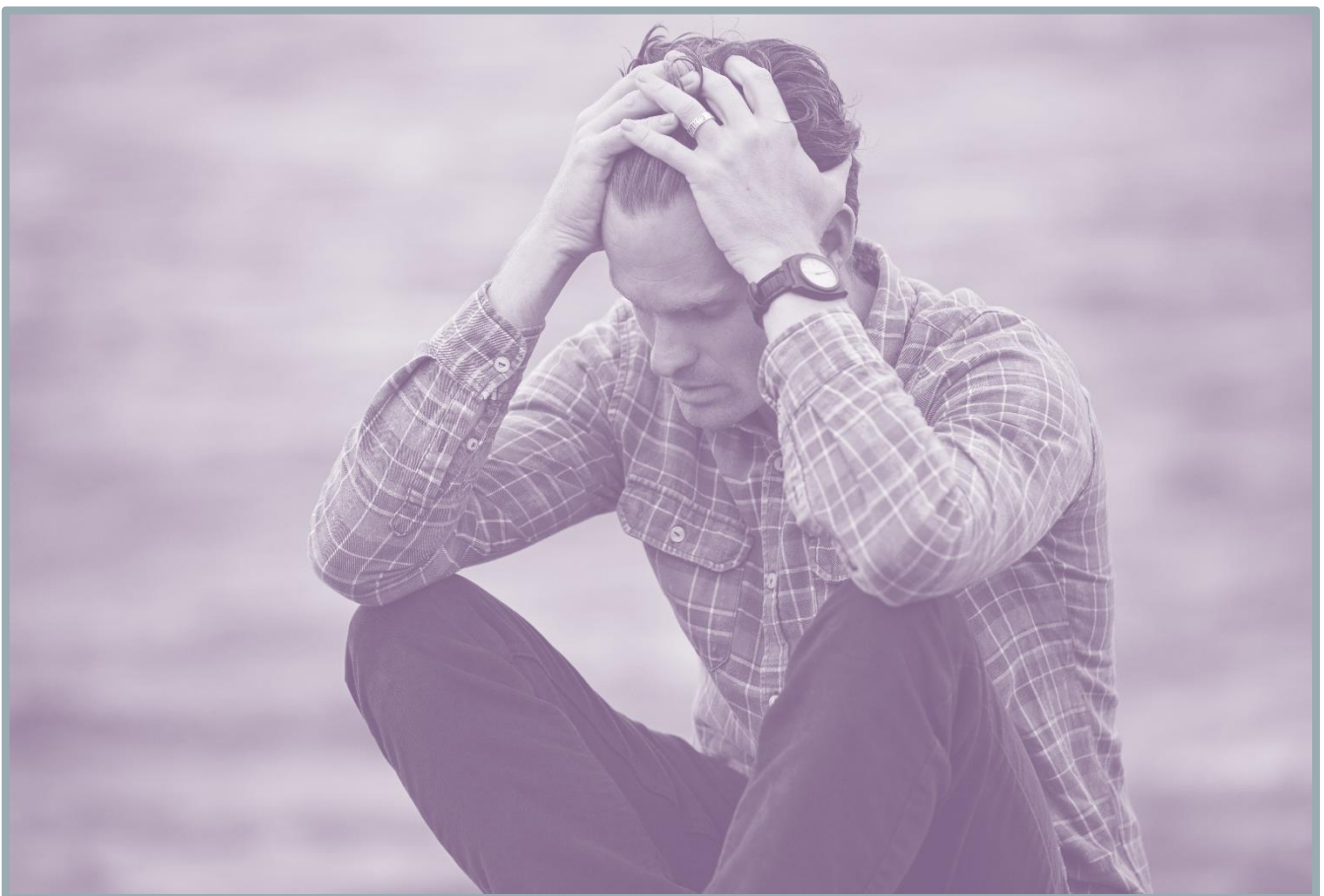


Submission to the Northern Territory Government

Review of Legislation and the Justice Response to Domestic and Family Violence in the Northern Territory



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Acknowledgment of Country

No to Violence acknowledges First Nations Peoples across these lands; the Traditional Custodians of the lands and waters. We pay respect to all Elders, past, present, and emerging. We acknowledge a deep connection with country which has existed over 60,000 years. We acknowledge that sovereignty was never ceded, and this was and always will be First Nation's land.



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Executive summary

Language note: *The term Aboriginal is used throughout this document to refer to all people of Aboriginal and Torres Strait Islander descent who are living in the Northern Territory. The use of this term reflects the wishes of Aboriginal people in the Northern Territory.*

Please be aware that this document contains the names of Aboriginal people who have died.

No to Violence is pleased to provide feedback on the Northern Territory (NT) Government's Review of Legislation and the Justice response to the Domestic and Family Violence in the Northern Territory: Proposals for Consultation.

The ambitious reform agenda detailed in the consultation paper demonstrates a new commitment to addressing domestic and family violence in the NT, and a commitment to resourcing the domestic and family violence sector and the human services and courts systems more generally. We support the principle of systemic reform and look forward to working with the Government to support ongoing reform aimed at addressing this most important and complex social issue.

Working collaboratively with Aboriginal communities must be a central tenant of the NT Government's reform agenda. Family violence experienced by Aboriginal communities must be understood within the specific cultural and historical context of colonisation and systemic marginalisation. Family violence is not a problem *only* for or in Aboriginal communities, but it is an urgent issue. An evaluation of family violence in Aboriginal communities in Australia identified its presence is connected to the ongoing impacts of colonisation, including collective dispossession and the loss of land and traditional culture, including the fragmentation of kinship systems and Aboriginal law.¹ These drivers intersect with and often compound the well-known drivers of violence against women.²

If the reforms reflected in the consultation paper are to function as intended, they must first work effectively for Aboriginal people and communities. The NT Government must address the impacts of colonisation and related intergenerational trauma as part of its approaches to addressing family and domestic violence. It is not possible to meaningfully address family violence in the NT without simultaneously addressing these legacies, and the continued structural oppression endured by Aboriginal communities.

The consultation paper poses two questions. Firstly, whether the NT Government should embark on a four year whole-of-system reform before considering the criminalisation of coercive control, or secondly, whether the NT Government should criminalise coercive control in conjunction implementing a four-year whole-of-system reform.

No to Violence supports the NT Government's proposal for a four-year whole of system, structural reform agenda. The NT Government may, through this process of submissions and consultations with the family violence sector, Aboriginal communities, actors within the criminal justice system, and other critical stakeholders, come to its own conclusion about whether the introduction of an offence

¹ Blagg, H, Bluett-Boyd, N, and Williams, E (2015). Innovative models in addressing violence against Indigenous women: State of knowledge paper, Australia's National Research Organisation for Women's Safety Limited, Sydney, New South Wales.

² Our Watch, 'The Issue: What Drives Violence against Women?', ourwatch.org.au, 2022, <https://www.ourwatch.org.au/the-issue/>.

for coercive control should occur immediately, or whether this might be better considered in tandem with other structural reform.

No to Violence has provided valued advice on legislating and responding to coercive control in a variety of states and territories. As Australia's peak body for organisations working with men to end their use of family violence, we understand the importance of introducing legislation in a way that enables its successful implementation.

Through 30 years of working in the men's family violence sector and our more recent work on coercive control, No to Violence knows that legislating alone is unlikely to support the safety of women and children or hold perpetrators accountable for their use of violence.

However, No to Violence supports in principle the introduction of coercive control legislation. Its inclusion in statute has the potential to improve responses to family and domestic violence by better defining the extent of its totality and reflecting the lived experience of victim-survivors. However, the efficacy of a new offence will only be realised if there is adequate capacity and capability building across all sectors that provide a response to domestic and family violence, including criminal justice, police, specialist and generalist services and all other frontline responders. Critically, the specialist family violence sector must be adequately resourced to provide connected services and whole-of-system responses for victim-survivors and perpetrators.

Working with men who use family violence to change their behaviour is an important part of the support and services infrastructure and must sit alongside support and services for victim-survivors. Our work and the work of our members is directed at in creating a future free from men's violence. Family violence is everyone's problem, but it starts and stops with men.

Summary of recommendations

No to Violence recommends that, in its Review of Legislation and the Justice response to the Domestic and Family Violence in the Northern Territory, the Government:

1. Include No to Violence as a member of the Domestic, Family, and Sexual Violence Interagency Coordination and Reform Office (DFSV-ICRO), and any DFV inter-agency co-ordination mechanism or working groups which succeed it, to embed our expertise in all family violence reform work, including the development of the Second Action Plan
2. Embed increased investment in public housing and poverty reduction programs as part of the Second Action Plan to reduce family violence
3. Implement Proposal SR 2 to ensure that all domestic and family violence reforms align with the Aboriginal Justice Agreement and address the impacts of colonisation and related Aboriginal intergenerational trauma as part of the reform agenda to reduce family violence
4. Engage in targeted, ongoing consultations with Aboriginal Community Controlled Organisations (ACCOs) to ensure the experiences and concerns of Aboriginal peoples are considered and addressed in the reform agenda including the introduction of any subsequent legislative and policy changes.
5. Engage in targeted consultations with other marginalised groups, including migrant and refugee communities; people with disabilities; LGBTIQ+ people; people in institutional settings; and victim-survivors, to ensure their lived experiences are considered and addressed in the reform agenda and the introduction of any subsequent legislative and policy changes.
6. Implement Proposal SR 26 to establish a systems-driven domestic and family violence death review process in the NT and include No to Violence as part of the inter-agency leadership and governance structure
7. Implement Proposal SR 21 to consider developing a costed plan to increase the availability of high quality DFV perpetrator programs in the NT
 - a. No to Violence recommends the NT Government conduct an analysis of the number of funded places required to meet both current demand and the latent, in-built future demand growth in the system, projected as a rising number of funded places over the next seven financial years, with projected increases differentiated according to each of the NT's 17 local councils
8. Allocate new and additional funding for universal wrap-around services—and especially for remote areas-- including AoD, mental health, public housing, crisis and emergency housing, and employment and income support programs, to create an enabling and supportive environment for perpetrator intervention programs and services.
9. Implement Proposal SR 22 and include NTV in the proposed multi-agency oversight committee to ensure a suite of accountable high quality DFV perpetrator programs that prioritise victim-survivor safety are available across the NT.
10. Implement, with the support of No to Violence, Proposals SR 17, 18, and 19 to ensure all legal practitioners and services have adequate capacity to provide legal assistance to all persons affected by domestic and family violence—including people who use violence and people who are victim-survivors.
11. Implement, with the support of No to Violence, Proposal SR 13 to align police practice with the NT's Risk Assessment and Management Framework (RAMF)

12. Work with No to Violence to implement Proposals SR 23 and 24 to expand and strengthen the NT's DFV Risk Assessment and Management Framework (RAMF) and the Family Safety Framework (FSF)
13. Work with No to Violence, ACCOs, and other specialist agencies to implement Proposal SR 25 to develop guidelines on how the Multi-Agency Community and Child Safety Framework (MACCST) will deal with children exposed to and affected by DFV in line with the RAMF.
14. Implement Proposal SR 11 to assist police to identify coercive control and respond to coercive control as a high-risk factor for serious harm and death
15. Undertake an independent review of the Northern Territory Police response to family and domestic violence to inform the systemic and whole-of-systems review
 - a. Implement Proposal SR 12 to review all police training
16. Develop and implement, with the support of ACCOs and specialist family violence organisations including No to Violence, a training package for NT Police to minimise and reduce the likelihood of misidentification of the predominant aggressor and reduce the over-incarceration of Aboriginal peoples, specifically Aboriginal women.
17. Implement Proposals SR 8 and SR 12 and work with ACCOs and specialist family violence organisations including No to Violence to develop and implement an ongoing training a training package for NT Police on coercive control and increase the availability of training in relation to domestic and family violence specifically tailored to police, prosecutors, judges, lawyers and front-line workers to assist in identifying and responding to coercive control and DFV for NT Police and others within the criminal justice system in responding to family violence regardless of whether coercive control is criminalised.
 - a. It is critical that this training emphasises the gendered nature of family violence and works to reduce the occurrence and impacts of misidentification of the predominant aggressor
 - b. No to Violence recommends that all training be on-going, mandatory, and iterative
18. With the support of DFSV-ICRO and the input of No to Violence, develop a working group to support NT Police and the NT criminal justice system to reduce the likelihood and impacts of misidentification of the predominant aggressor
19. Consult with NAAFLS and other Aboriginal legal and service organisations and well as victim-survivors, in all their diversity, to understand the extent to which DVO processes work for remote Aboriginal communities, and the extent to which the proposals would or would not support the safety of victim-survivors.
20. Ensure that police, legal services, judges, and other members of the criminal justice system undertake timely, mandatory and consistent training regarding any reforms of the DVO process.
21. Refrain from requiring police to provide a certificate to the Court at the first mention in all applications of DVOs (SR 14)
22. Implement Proposal SR 3 and prioritise the development and expansion of community-based responses to domestic violence in Aboriginal communities
23. Expand the availability of culturally safe support services, including housing, to make it easier for victim-survivors to safely leave a dangerous situation
24. Implement Proposal SR 7, 9, and 10 to fund tailored community awareness and legal education to expand knowledge about coercive control and the options available for people experiencing it, regardless of whether it is criminalised. Community legal education should also be funded to support and inform people who have committed family violence offences, including by providing community legal education in prisons

25. In consultation with Aboriginal Community Controlled Organisations and other relevant stakeholders, develop and implement cultural awareness and anti-racism training to ensure that family violence is responded to in a culturally appropriate manner
26. Pilot new and expand existing community and restorative justice programs to support victim-survivors and hold perpetrators accountable, including building on the early work undertaken in consultation with No to Violence, to develop an Aboriginal Family Violence Court using the Barndimalgu Court model
27. Develop and implement a Compliance Framework to ensure that all MBCP providers are meeting the NTV Minimum Standards or other commensurate standards (such as Central Australian Minimum Standards, CAMS) to ensure service providers have the training, resources, and supports they need to deliver high-quality programs in line with existing standards
28. Support No to Violence to work with new and emerging perpetrator intervention services to ensure new providers meet the Minimum Standards
 - a. Support No to Violence to develop an auditing tool to determine whether new program providers have sufficient practice management, supervision, inter-agency collaboration, program design methodology, and staffing to meet the Minimum Standards
29. Work with No to Violence to develop a workforce development strategy to ensure new and emerging perpetrator intervention providers and facilitators can meet the Minimum Standards
30. Implement Proposal SR 21 prior to implementing Proposals LR 18, and implement Proposal LR 18 only when there are an adequate number of high quality and accessible MBCPs to meet demand
31. Allocate new and additional resources to ensure there are appropriate and accessible behaviour change programs for Aboriginal people in the Territory.
32. Embed funding for independent program-level evaluation as part of all funding agreements for perpetrator interventions
 - a. Provide funding for services to implement evaluation findings to ensure learning is translated into practice.
33. Fund No to Violence to work in partnership with Tangentyere Council and Catholic Care to roll-out training for ACCOs, service providers, and other community-based organisations to ensure perpetrators can access high-quality, culturally safe, evidence-based programs from appropriately trained facilitators and providers.
34. Invest in specialised and culturally-specific men's family violence training to expand the number of Aboriginal practitioners who are qualified and skilled to work with Aboriginal perpetrators of family violence.
35. Expand LR 40 to include a mandatory requirement that police refer alleged perpetrators to the Men's Referral Service and SR 15 to include funding for the establishment of a local office of NTV's Men's Referral Service to provide support and referral services for perpetrators
 - a. No to Violence proposes co-locating an MRS counsellor with the Tangentyere Council to increase the likelihood that Aboriginal men can utilise the service.
36. Create and provide training in mandatory referral procedures for NT Police to refer perpetrators of domestic and family violence to the Men's Referral Service
37. Ensure there are adequate and appropriate services for MRS to refer perpetrators into
38. Support the expansion of Brief Intervention Service (BIS), or a similar program, to the Northern Territory to ensure men who are unable to immediately access programs

39. Pilot an expansion of No to Violence’s Men’s Accommodation and Counselling Service (MACS) to support men who have been excluded from the home to access the services they need while supported with suitable housing
40. Implement SR 2 to ensure full alignment between proposed reforms and the objectives of the Aboriginal Justice Agreement.
41. Collaborate with Aboriginal communities and ACCOs to develop and implement a specific Aboriginal Family Safety Strategy, aligned with the Aboriginal Justice Agreement and the proposed Aboriginal-specific National Plan to end violence against women and children
42. Prioritise the training of the criminal justice system by implementing SR 8:
 - a. Ensure this training is delivered by specialist domestic and family violence professionals and involve co-production between victim-survivors, the sector, and police.
43. Prioritise Proposals SR 11, 12, 13, 21 and 22 prior to implementing Proposals SR 7 and 9 to bolster the capacity and availability of support services and improve the overall criminal justice response to domestic and family violence.

Addressing domestic and family violence within the Northern Territory

No to Violence welcomes the opportunity to provide feedback on this urgently required set of proposed reforms. Addressing domestic and family violence in the Northern Territory (NT) requires a tailored approach to address the particularities of the NT community.

The NT has a population of almost 233,000 people and has the highest proportion of Indigenous residents (32%) of all Australian states and territories.³ One-quarter of the NT population reside in Darwin, just under ten percent live in Alice Springs,⁴ and the remaining 65% are spread across the rest of the Territory, often requiring lengthy travel to access essential services including medical care, hospitals, and police.

Underfunding of public housing has led to over-crowding across the Territory, exacerbated in remote areas. Fifty-four percent of housing in remote Aboriginal communities is considered over-crowded, the highest levels of overcrowding anywhere in Australia.⁵ The links between poor quality housing and homeless with poverty are well-established,^{6 7} and poverty is a significant issue across the Territory, particularly for remote Aboriginal communities. Data show nearly 45% of all Aboriginal households in the NT live below the poverty line.⁸ Overcrowding and poor-quality housing are associated with poor health, educational and employment outcomes, and increased family violence.^{9 10}

Poverty fundamentally limits choice, including the choice to seek new, appropriate housing; the choice to eat healthy foods or seek medical attention and the choice to leave a violent relationship. Experiences of poverty are also associated with negative health outcomes more broadly.¹¹

As stated in the Northern Territory's Domestic, Family & Sexual Violence Reduction Framework 2018–2028¹², NT has the highest rates of domestic and family violence in Australia, with 1,730 victims of domestic and family violence related offences per 100,000 people.¹³ This victimisation rate is about three times higher than any other jurisdiction. The framework report also highlights:

³ Australian Institute of Health and Welfare., July 2022. Profile of Indigenous Australians. <https://www.aihw.gov.au/reports/australias-health/profile-of-indigenous-australians>

⁴ Population Australia, 2022. <https://www.population.net.au/alice-springs-population/>

⁵ Australian National Audit Office, Feb 2022. Remote Housing in the Northern Territory. <https://www.anao.gov.au/work/performance-audit/remote-housing-the-northern-territory>

⁶ Rebecca Tunstall et al, 2013. The links between housing and poverty. <https://www.jrf.org.uk/report/links-between-housing-and-poverty>

⁷ Anti-Poverty Week, 2020. <https://antipovertyweek.org.au/wp-content/uploads/2020/09/APW-Poverty-and-Housing-Fast-Fact-September-2020.pdf>

⁸ Australian National University, Nov 2017. Deepening indigenous poverty in the Northern Territory. <https://regnet.anu.edu.au/news-events/news/7002/deepening-indigenous-poverty-northern-territory#:~:text=In%20Australia%2C%20data%20shows%20that,also%20found%20in%20the%20NT.>

⁹ Australian National Audit Office, 2022.

¹⁰ The Northern Territory's Domestic, Family and Sexual Violence Reduction Framework 2018-2028.

¹¹ Australian Housing and Urban Research Institute, 2017. Research synthesis of social and economic outcomes of good housing for Aboriginal and Torres Strait Islander People, <https://www.niaa.gov.au/sites/default/files/publications/research-synthesis-social-economic-outcomes-housing.pdf> [accessed 3 October 2022].

¹² The Northern Territory's Domestic, Family and Sexual Violence Reduction Framework 2018-2028.

¹³ As above; According to the ABS, Victoria and Queensland do not publish FDV assault data. This means there is no nationally representative data on the national average of FDV assault/100,000 people in Australia. Recorded Crime – Victims. ABS. 2022. <https://www.abs.gov.au/statistics/people/crime-and-justice/recorded-crime-victims/latest-release#victims-of-family-and-domestic-violence-related-offences>

- The NT has the highest rate of domestic and family violence homicide, with 4/100,000 people, compared to the national average of 1.4/100,000.¹⁴
- The NT has the highest rate of sexual assault, with 164/100,000, compared with the national average of 121/100,000.¹⁵
- Aboriginal people in the NT are 18 times more likely to be victimised than non-Aboriginal people, making Aboriginal people in the NT nine times more likely to be victims of domestic and family violence than their counterparts elsewhere in Australia.¹⁶

The Northern Territory's Domestic, Family & Sexual Violence Reduction Framework focuses on ending family violence and supporting victim-survivors, in all their diversity, with the following outcome:¹⁷

1. Domestic, family and sexual violence is prevented and not tolerated.
2. Territorians at risk of experiencing violence are identified early and provided with effective interventions.
3. People experiencing domestic, family and sexual violence are protected and helped to recover and thrive.
4. Perpetrators are held accountable and connected early to responses that change their behaviours and reduce violence.
5. Legislation, policy and funding models enable a responsive, high quality and accountable domestic, family and sexual violence service system.

With the first Action Plan ending in 2021, this consultation comes at an opportune time to take stock, evaluate, and review, and build on what works. Embarking upon a reform agenda in parallel to the second Action Plan should create a strong foundation from which the NT Government and family violence sector can better address the urgent gaps in primary prevention, early intervention, service provision, and recovery.

As noted in the Consultation Paper, perpetrator intervention remains the most under-developed and under-resourced parts of the family violence service system in the NT, rendering the services system under resourced and incomplete. The NT Government should provide increased resources to ensure perpetrator interventions are accessible, appropriate, and safe for all Territorians ensuring a whole of system response to family violence.

No to Violence has written this submission in response to the systemic reform proposals in the Consultation Paper. Our response to the legislative reforms will be addressed in a subsequent paper. A comprehensive list of systemic reforms can be found in Appendix 2.

Recommendations:

1. Include No to Violence as a member of the Domestic, Family, and Sexual Violence Interagency Coordination and Reform Office (DFSV-ICRO), and any DFV inter-agency co-ordination mechanism or working groups which succeed it, to embed our expertise in all family violence reform work, including the development of the Second Action Plan
2. Embed increased investment in public housing and poverty reduction programs as part of the Second Action Plan to reduce family violence

¹⁴ Australian Bureau of Statistics, 2021. Recorded Crimes – Victims. <https://www.abs.gov.au/statistics/people/crime-and-justice/recorded-crime-victims/latest-release>

¹⁵ Australian Bureau of Statistics, 2021. Recorded Crimes – Victims. <https://www.abs.gov.au/statistics/people/crime-and-justice/recorded-crime-victims/latest-release>

¹⁶ Australian Institute of Health and Welfare. <https://www.aihw.gov.au/reports/indigenous-australians/family-violence-indigenous-peoples/summary>

3. Implement Proposal SR 2 to ensure that all domestic and family violence reforms align with the Aboriginal Justice Agreement and address the impacts of colonisation and related Aboriginal intergenerational trauma as part of the reform agenda to reduce family violence
4. Engage in targeted, ongoing consultations with Aboriginal Community Controlled Organisations (ACCOs) to ensure the experiences and concerns of Aboriginal peoples are considered and addressed in the reform agenda including the introduction of any subsequent legislative and policy changes.
5. Engage in targeted consultations with other marginalised groups, including migrant and refugee communities; people with disabilities; LGBTIQ+ people; people in institutional settings; and victim-survivors, to ensure their lived experiences are considered and addressed in the reform agenda and the introduction of any subsequent legislative and policy changes.
6. Implement Proposal SR 26 to establish a systems-driven domestic and family violence death review process in the NT and include No to Violence as part of the inter-agency leadership and governance structure

Enhancing the Service System Response

The NT family violence service system faces ongoing resourcing challenges. The geographic distribution of the Territory’s population makes traditional service provision a significant challenge. If the NT Government is to meaningfully implement the envisioned whole-of-system reform, the family violence service system required appropriate resourcing, including funding that supports community-led organisations to ensure Territorians have access to safe and appropriate support and services.

Enhancing the service system response necessitates ensuring that the criminal justice system responds appropriately to domestic and family violence. The below section focuses on the family violence sector’s ability to appropriately respond to existing needs, and the impacts that proposed systemic reforms may have. The section further considers risk assessment and police responses and the availability and accessibility of perpetrator interventions. No to Violence’s responses to the legislative reforms associated with these topics within the Consultation Paper will be put forward in a subsequent submission.

The proposed systemic reforms proposed in the Consultation Paper require enhanced resourcing of the family violence service system, including perpetrator intervention providers, to support current demand and to increase its capacity for future demand.

Recommendations:

7. Implement Proposal SR 21 to consider developing a costed plan to increase the availability of high quality DFV perpetrator programs in the NT
 - a. No to Violence recommends the NT Government conduct an analysis of the number of funded places required to meet both current demand and the latent, in-built future demand growth in the system, projected as a rising number of funded places over the next seven financial years, with projected increases differentiated according to each of the NT’s 17 local councils
8. Allocate new and additional funding for universal wrap-around services—and especially for remote areas-- including AoD, mental health, public housing, crisis and emergency housing, and employment and income support programs, to create an enabling and supportive environment for perpetrator intervention programs and services.

9. Implement Proposal SR 22 and include NTV in the proposed multi-agency oversight committee to ensure a suite of accountable high quality DFV perpetrator programs that prioritise victim-survivor safety are available across the NT.

Systemic Criminal Justice Reform

Implementing the systemic reform proposals in the Consultation Paper requires an informed and specialist criminal justice system, including prosecutors and legal services.

Recommendations

10. Implement, with the support of No to Violence, Proposals SR 17, 18, and 19 to ensure all legal practitioners and services have adequate capacity to provide legal assistance to all persons affected by domestic and family violence—including people who use violence and people who are victim-survivors.

Assessing risk, information sharing, and response

No to Violence is well-placed to support the implementation of Proposal SR 13 to align police practice with the Risk Assessment and Management Framework (RAMF), and Proposals SR 23 and 24 regarding interest in strengthening existing risk assessment and management frameworks (the RAMF and the Family Safety Framework, or FSF) to ensure they capture the multi-dimensional risk people who use family violence often pose to victim-survivors. We note that the NT Government has drawn upon Victoria's family violence risk assessment and information sharing scheme (Multi-Agency Risk Assessment and Management Information Sharing, or MARAMIS) in its development of the RAMF and FSF.

No to Violence is a trusted partner of the Victorian Government across a range of policy and practice, including risk assessment, management, and information sharing. The Victorian Government introduced the Multi-Agency Risk Assessment and Management (MARAM) framework, as well as the MARAM Information Sharing (MARAMIS) frameworks, in the wake of the 2016 Royal Commission into Family Violence.

No to Violence continues to play a key role in the roll-out of MARAM across Victoria's family violence sector. To date, No to Violence has provided expert advice and guidance by building practitioner capacity, including through:

- multi-media awareness raising about the practical usage of MARAM through the Adult Person Using Violence Practice Guides;
- collaborating with specialist victim-survivor services to roll-out web series on applying MARAM to people who use and have been victimised through sexual assault; developed and ran communities of practice for the sector to improve sectoral understanding of MARAM and its application for people who use family violence;
- regular presentations to the sector on the practicalities of MARAM; and the development of key practical resources for practitioners; and
- on-going support for organisations to embed the new practice guides on MARAM and people who use family violence. No to Violence also sits on the Victorian Government's MARAM Workforce Implementation Working Group to provide sector-wide guidance.

No to Violence is therefore well-placed to support the expansion, refinement, or re-working of the RAMF and FSF and alignment with police practice that may emerge from these reforms.

Recommendations:

11. Implement, with the support of No to Violence, Proposal SR 13 to align police practice with the NT's Risk Assessment and Management Framework (RAMF)
12. Work with No to Violence to implement Proposals SR 23 and 24 to expand and strengthen the NT's DFV Risk Assessment and Management Framework (RAMF) and the Family Safety Framework (FSF)
13. Work with No to Violence, ACCOs, and other specialist agencies to implement Proposal SR 25 to develop guidelines on how the Multi-Agency Community and Child Safety Framework (MACCST) will deal with children exposed to and affected by DFV in line with the RAMF.

Systemic reforms for NT Police

Police reform and enhanced training are required to improve responses to family violence. No to Violence is concerned that, without commensurate police training and reform, that the necessary systemic and legislative reforms will fall short of their targets. No to Violence will address the Legislative Reforms regarding police, as well as Legislative Reforms for the broader criminal justice system, in our subsequent submission.

NT Police have a uniquely challenging role given the Territory's geography. Developing trusted relationships with community is complicated by the tyranny of distance, and the practicalities of transporting workers and responders to and from remote communities or when victim-survivors are required to travel to access emergency and other critical support, or service is hampered by it.

NT Police arguably have a tenuous relationship with Aboriginal communities. As the Coroner's Inquest into the death of Roberta Judy Curry reported, NT Police cannot reliably support Aboriginal women experiencing domestic and family violence.¹⁸ The Inquest found that when Roberta, an Aboriginal woman who had experienced multiple, documented violent assaults by her former partner 'finally called the police, they did nothing to help her. To the contrary, the police members were rude to her and dismissed her complaints. They failed to follow any of their procedures concerning domestic violence complaints. The police told her not to call again and she did not.... [five] days after she reported him to the police, Roberta was killed by Lorenzo.'¹⁹

The Inquests into the deaths of Fionica Yarranganlagi James, Keturah Cheralyn Mamarika, Layla Leering; Sasha Loreen Napaljarri Green; Wendy Murphy and Natalie McCormack; demonstrate that NT Police do not effectively and consistently fulfill their duty of care to Aboriginal women experiencing family violence.²⁰

NT Police must improve their relationships with Aboriginal people and communities. Walpiri elders have unequivocally said that increasing the police presence in remote areas of the Territory is a 'direct threat' to the safety of Aboriginal people.²¹ It is unclear how NT Police might respond to ant new family violence offence or enhanced operational procedures given the well-documented challenges in their ability to consistently respond to all victim-survivors of domestic and family violence.

¹⁸ NT Coroners Court, 'Inquest into the Death of Roberta Judy Curry [2022] NTLC 010' (Darwin: Northern Territory Coroners Court, 2022), https://justice.nt.gov.au/_data/assets/pdf_file/0012/1113600/D01052019-Roberta-Curry.pdf.

¹⁹ NT Coroners Court, 19.

²⁰ Layla NT Coroners Court, 'Inquest into the Deaths of Fionica Yarranganlagi James, Keturah Cheralyn Mamarika and Layla Leering [2020] NTLC 022' (Darwin: Northern Territory Coroners Court, 2017); NT Coroners Court, 'Inquest into the Death of Sasha Loreen Napaljarri Green [2018] NTLC 016' (Darwin: Northern Territory Coroners Court, 2018); NT Coroners Court, 'Inquest into the Deaths of Wendy Murphy and Natalie McCormack [2016] NTLC 024' (Darwin: Northern Territory Coroners Court, 2016).

²¹ Calla Wahlquist, 'More Police in Remote NT Areas Is a "Direct Threat" to Aboriginal Community, Elders Say', *The Guardian*, 6 May 2022, sec. Australia news, <https://www.theguardian.com/australia-news/2022/may/06/more-police-in-remote-nt-areas-is-a-direct-threat-to-aboriginal-community-elders-say>.

The policing reforms included in the Consultation Paper are an important place to start. However, the inquests cited above reveal the challenges of successfully implementing this reform agenda.

No to Violence understands the barriers and difficulties of changing police culture and practice, noting these in our submission to the NSW Auditor General's review into the policing response to domestic violence and Queensland's Independent Commission of Inquiry into the Queensland Police Service's responses to family violence.²² No to Violence also provided expert advice on inclusions for the recently updated Victorian Code of Practice for the Investigation of Family Violence.²³ In our submission to the Victorian Police Code of Practice, we noted that it is important that police services acknowledge that fear of police causes under-reporting of domestic violence, and that significant work must be undertaken to increase community trust. We also noted that in addition to demonstrating commitment to on-going practice to reduce the likelihood of misidentification of the predominant aggressor, police services must have clearly articulated contingency plans for when misidentification of the predominant aggressor does occur.²⁴

No to Violence has provided training to Victoria and Tasmania Police Services on identifying and responding to perpetrators of family violence, including identifying and responding to coercive control. No to Violence is well-placed to support the NT Police to improve their understanding of the gendered nature of family violence, including responding to perpetrators of family violence and coercive control in alignment with Proposal SR 11.

While acknowledging the complexities of operational policing, we recommend a review of the NT Police response to family and domestic violence to honour the commitment made in the Aboriginal Justice Agreement to 'identify and eliminate systemic racism in government agencies and contracted service providers that directly or indirectly discriminate against Aboriginal Territorians engaged in the justice system'.²⁵ to identify systemic racism and options for reform, and by developing and implementing an NT-wide campaign against racism that impacts on Aboriginal people engaged in the justice system.²⁶

Recommendations:

14. Implement Proposal SR 11 to assist police to identify coercive control and respond to coercive control as a high risk factor for serious harm and death
15. Undertake an independent review of the Northern Territory Police response to family and domestic violence to inform the systemic and whole-of-systems review
 - a. Implement Proposal SR 12 to review all police training
16. Develop and implement, with the support of ACCOs and specialist family violence organisations including No to Violence, a training package for NT Police to minimise and reduce the likelihood of misidentification of the predominant aggressor and reduce the over-incarceration of Aboriginal peoples, specifically Aboriginal women.
17. Implement Proposals SR 8 and SR 12 and work with ACCOs and specialist family violence organisations including No to Violence to develop and implement an ongoing training a training package for NT Police on coercive control and increase the availability of training in relation to domestic and family violence specifically tailored to police, prosecutors, judges, lawyers and front-line workers to assist in identifying and responding to coercive control and

²² No to Violence, 'Submission to the Queensland Government: Independent Commission of Inquiry into Queensland Police Service Responses to Domestic and Family Violence' (No to Violence, 2022).

²³ No to Violence, 'Response to Draft Victoria Police: Code of Practice for the Investigation of Family Violence' (No to Violence, 2021), https://ntv.org.au/wp-content/uploads/2022/07/NTV-Feedback-to-Victoria-Police_The-Code.pdf.

²⁴ No to Violence, 8.

²⁵ Department of the Attorney-General and Justice, 2021, p.21.

²⁶ Department of the Attorney-General and Justice, 2021, p.21.

DFV for NT Police and others within the criminal justice system in responding to family violence regardless of whether coercive control is criminalised.

- a. It is critical that this training emphasises the gendered nature of family violence and works to reduce the occurrence and impacts of misidentification of the predominant aggressor
- b. No to Violence recommends that all training be on-going, mandatory, and iterative

Misidentification of the predominant aggressor

The introduction of any new criminal law brings with it the potential for unintended consequences. As raised in submissions and hearings by the NSW Joint Select Committee on Coercive Control, this includes the opportunities seized by perpetrators of domestic and family violence to manipulate, mislead, and deceive police, leading to victim-survivors being misidentified as the predominant aggressor.²⁷ This is a significant issue of concern for Aboriginal women because of deeply embedded racism.²⁸ We strongly recommend NT Police receive specialised training on assessment of the predominant aggressor.

The risk of misidentification of the predominant aggressor may be reduced through changes to police protocol when responding to domestic and family violence incidents, supported by revised risk frameworks. Ensuring that risk assessments capture as much pertinent information as possible to enable police to identify a pattern of behaviour rather than a single incident. Evidence needs to be captured, monitored, and evaluated from the commencement of the legislation.

No to Violence is on the advisory group of Victoria Police's Northwest Metro Melbourne region-based trial to reduce the occurrence and impacts of misidentification of the predominant aggressor. We provide expert advice on introducing new and amending existing procedures and forms, such as the Victoria Police Risk Assessment and Management Report, or L17, to better capture the pattern of behaviour that characterises domestic and family violence. This project considers the ways in which charges can be withdrawn once made; current barriers to proactive information sharing, and existing and needed feedback loops to ensure specialist family violence services can effectively liaise with police services if and when suspected misidentification occurs. No to Violence would welcome the opportunity to provide our expertise and support to the NT Police.

Recommendations

18. With the support of DFSV-ICRO and the input of No to Violence, develop a working group to support NT Police and the NT criminal justice system to reduce the likelihood and impacts of misidentification of the predominant aggressor

Systemic reforms to address the ADVO scheme

No to Violence recommends the NT Government refrain from implementing Proposal SR 14, to require police to provide a certificate to the court at the first mention in all applications for DVOs, that summarises the defendant's criminal history and a history of all DVOs that have been in force (and relevant Legislative Reforms, which will be explored in detail in a subsequent submission).

The implementation of Proposal SR 14 will support the safety and well-being of victim-survivors, nor will it align with the Aboriginal Justice Agreement and SR 2. Given the historical and contemporary challenges with NT Police's responses to domestic and family violence, including the misidentification of the predominant aggressor, No to Violence cannot confidently say that bringing a defendant's

²⁷ No to Violence, 'NTV Discussion Paper: Predominant Aggressor Identification and Victim Misidentification'.

²⁸ Althea Gibson, Emma Buxton-Namisnyk, and Peta MacGillivray, 'Unintended, but Not Unanticipated: Coercive Control Laws Will Disadvantage First Nations Women', *The Conversation*, accessed 16 September 2022, <http://theconversation.com/unintended-but-not-unanticipated-coercive-control-laws-will-disadvantage-first-nations-women-188285>.

entire criminal history and history of all DVOs to Court at the first mention would not exacerbate pre-existing marginalisation. This includes current and historical over-policing and over-incarceration of Aboriginal and other marginalised peoples.

No to Violence will address the questions for legislative reform of domestic violence orders in a supplementary submission.

Recommendations:

19. Consult with NAAFLS and other Aboriginal legal and service organisations and well as victim-survivors, in all their diversity, to understand the extent to which DVO processes work for remote Aboriginal communities, and the extent to which the proposals would or would not support the safety of victim-survivors.
20. Ensure that police, legal services, judges, and other members of the criminal justice system undertake timely, mandatory, and consistent training regarding any reforms of the DVO process.
21. Refrain from requiring police to provide a certificate to the Court at the first mention in all applications of DVOs (SR 14)

An alternative to incarceration

*'We must talk about solutions beyond incarceration' – Professor Chelsea Watego, Professor of Indigenous Health, QUT*²⁹

Significant work has been done by Aboriginal legal organisations, scholars, and Elders to explore the role of Aboriginal lore and law in responding to family violence in culturally safe, resonant, and appropriate ways.³⁰ Working in partnership with Aboriginal communities, leaders, ACCOs, and Elders is a vital part of responding to family violence in Aboriginal communities. A recent paper by Blagg et al explores the perspectives of Aboriginal Elders on family violence in Australia and offers important insights and practices that should be embedded in this reform agenda.³¹ This includes by working on Country, offering community-led solutions, and addressing health related issues, including trauma, disability, and mental illness, whenever someone who uses or has been impacted by family violence comes into contact with the legal system.³²

The Aboriginal Justice Agreement, through its aim of reducing the offending and imprisonment of Aboriginal Territorians, highlights several actions to create viable alternatives to incarceration and imprisonment.³³ These include:

- Establish, maintain, and offer alternatives to custody for Aboriginal offenders in the Northern Territory.
- Ensure that Aboriginal Territorians are involved in the governance, oversight and operation of alternatives to custody and implementation of services.
- Monitor and evaluate alternatives to custody and ensure they meet the needs of Aboriginal Territorians and the Northern Territory Government to achieve the aims of the Agreement.
- Research and develop a non-custodial facility in Central Australia with a therapeutic focus to address domestic and family violence.

²⁹ Victorian Aboriginal Legal Service, Addressing Coercive Control Without Criminalisation: Unlocking Victorian Justice Webinar, 2022, <https://www.youtube.com/watch?v=8Qm955v0nnU>.

³⁰ Harry Blagg et al., 'Law, Culture and Decolonisation: The Perspectives of Aboriginal Elders on Family Violence in Australia', *Social & Legal Studies* 31, no. 4 (2021): 535–58.

³¹ Blagg et al., 2021.

³² Blagg et al., 546.

³³ Department of the Attorney-General and Justice, 2021, pp.13-14.

No to Violence has already begun consultation work with the NT Government to develop an Aboriginal Family Violence Circle Court. Building on the successful implementation of the Barndimalgu in Geraldton, Western Australia, this model enables Aboriginal people to who have pleaded guilty to a family violence offence to take part in a 20-week program to address their violence behaviour *before* the sentence is delivered with the goal of enabling behaviour change while keeping Aboriginal people in the community and out of prison.³⁴ Developing this type of community-based response to family violence supports the enfranchisement of Aboriginal people and communities within the criminal justice system, while taking concrete steps towards meeting the stated aims of the Aboriginal Justice Agreement.

Recommendations:

22. Implement Proposal SR 3 and prioritise the development and expansion of community-based responses to domestic violence in Aboriginal communities
23. Implement Proposal SR 7, 9, and 10 to fund tailored community awareness and legal education to expand knowledge about coercive control and the options available for people experiencing it, regardless of whether it is criminalised. Community legal education should also be funded to support and inform people who have committed family violence offences, including by providing community legal education in prisons
24. In consultation with Aboriginal Community Controlled Organisations and other relevant stakeholders, develop and implement cultural awareness and anti-racism training to ensure that family violence is responded to in a culturally appropriate manner
25. Pilot new and expand existing community and restorative justice programs to support victim-survivors and hold perpetrators accountable, including building on the early work undertaken in consultation with No to Violence, to develop an Aboriginal Family Violence Court using the Barndimalgu Court model

Supporting people who use violence to choose a different path: increasing the accessibility and availability of high-quality interventions

In section 5.8.1.1, the Consultation Paper notes that ‘perpetrator programs remain the most under-developed part of the DFV response in the NT’ and that the accessibility, quality, and oversight of programs should be expanded. We note that the Aboriginal Justice Agreement’s actions aimed at reducing domestic and family violence offending, include a core action to ‘develop and implement a specialised approach for delivering men’s behaviour change, domestic and family violence programs.’³⁵

As the national peak body for organisations and individuals working with men who use family violence, No to Violence supports initiatives aimed at increased investment in, and reach of, the suite of perpetrator interventions. No to Violence sits on several Ministerial advisory and working groups across Australia and has 30 years of experience working with men who use family violence. We are well placed to support the expansion of programs, including tailored program delivery and by supporting service providers to meet minimum service and compliance standards, implement best-practice and engage in partner safety contact work.

³⁴ Department of Corrective Services, WA, ‘Barndimalgu Court and the Geraldton Family and Domestic Violence Project’, Alcohol and Other Drugs Knowledge Centre, 2021, <https://aodknowledgecentre.ecu.edu.au/key-resources/programs-and-projects/>; Research and Analysis Branch, Department of the Attorney General (WA), ‘Evaluation of the Metropolitan Family Violence Court and Evaluation of the Barndimalgu Court’ (Government of Western Australia Department of the Attorney General Policy and Aboriginal Services Directorate, 2014), https://department.justice.wa.gov.au/_files/fvc_evaluation_report.pdf.

³⁵ Department of the Attorney-General and Justice, 2021, p.14.

Minimum Standards

In 2020, the Tangentyere Council produced the Central Australian Minimum Standards (CAMS), for perpetrator intervention programs, based on the No to Violence Minimum Standards for Men's Behaviour Change Programs (MBCPs), which were developed in partnership between Family Safety Victoria and No to Violence and specifically adapted for the communities Tangentyere serves. No to Violence supports appropriate adaptation and tailoring of programs to better address client need, while also ensuring that service providers adhere to best practice.

We welcome any commitment to increasing resources for perpetrator interventions. However, this must be accompanied by sustainable and ongoing funding, sound contract terms and conditions, and a requirement that funding is tied to mandatory compliance to NTV's minimum standards framework. Independent and funded evaluation should be embedded in all program delivery. The Minimum Standards dictate, among other things, the levels of training required of MBCP facilitators. If perpetrator intervention service providers are required to meet the minimum standards, they ought to be resourced in a way that enables them to do so—including by enabling them to access evidence-based training.

Recommendations

26. Develop and implement a Compliance Framework to ensure that all MBCP providers are meeting the NTV Minimum Standards or other commensurate standards (such as Central Australian Minimum Standards, CAMS) to ensure service providers have the training, resources, and supports they need to deliver high-quality programs in line with existing standards
27. Support No to Violence to work with new and emerging perpetrator intervention services to ensure new providers meet the Minimum Standards
28. Support No to Violence to develop an auditing tool to determine whether new program providers have sufficient practice management, supervision, inter-agency collaboration, program design methodology, and staffing to meet the Minimum Standards
29. Work with No to Violence to develop a workforce development strategy to ensure new and emerging perpetrator intervention providers and facilitators can meet the Minimum Standards

Mandating perpetrator interventions for people who use violence (LR 18)

Accountability mechanisms for men using family violence to attend group work, and for MBCPs to be a consistent part of family violence response, particularly through mandate attendance, should be a key feature of the NT DFV Act. No to Violence supports LR 18 but, existing behaviour change programs are resource constrained. To fully operationalise this proposal additional resourcing of the men's sector will be required along with a range of other interventions that are complementary to men's behaviour change programs, as not all men are suited to engage in these programs.

There is a need to extend the number of intervention sites and providers gradually and progressively in conjunction with a workforce development strategy aligned with Minimum Standards.

The particularities of court attendance and mandated program attendance for people living in regional, remote and very remote areas will need to be taken into consideration in the execution of this proposal. Accessibility means programs are not just physically accessible, they must be culturally safe, appropriate, and relevant to the lived experiences of participants.

No to Violence also notes the promising programs available for women who use force, including the Victorian-based Positive Shift program and the Mparntwe/Alice Springs-based Kunga Stopping

Violence Program (KSVP).³⁶ All people who use family violence deserve access to the tailored support they need to choose a different path.

Recommendations

30. Implement Proposal SR 21 prior to implementing Proposals LR 18, and implement Proposal LR 18 only when there are an adequate number of high quality and accessible MBCPs to meet demand
31. Allocate new and additional resources to ensure there are appropriate and accessible behaviour change programs for Aboriginal people in the Territory.
32. Embed funding for independent program-level evaluation as part of all funding agreements for perpetrator interventions
 - a. Provide funding for services to implement evaluation findings to ensure learning is translated into practice.

Training for service providers working with Aboriginal communities

In 2016, No to Violence commissioned a literature review on Victorian Aboriginal Men's Programs which led to the creation of the 2017 conference 'Working with Aboriginal Men and Family Violence,' co-hosted with Kornar Winmil Yunti (KWY), a South Australia-based ACCO specialising in domestic and family violence, child protection and youth work, kinship care, and responses to other pressing social justice issues. Following this conference, No to Violence received funding from the Department of Social Services (DSS) to deliver training to Aboriginal communities to address family violence through community-led initiatives.

This training focused on addressing knowledge and skills gaps in working with people who use family violence and was aimed at professionals and service providers. While some Aboriginal communities have access to traditional MBCPs, many are unable to access services given the lack of program availability. No to Violence has continued working with Aboriginal communities in western NSW, Queensland, northern WA, and the NT to enable community-led, professional, safe, and relevant programs to support people using violence to change their behaviours. There is clearly a desire for a range of extended, appropriately supported, and resourced, community led men's behaviour change programs amongst the Aboriginal communities No to Violence has worked with.

Importantly, these measures should be accompanied by concerted efforts to increase the number of Aboriginal men and women practitioners that are qualified to work with Aboriginal perpetrators of family violence. Evidence from the healthcare and specialist family violence sectors suggests that Aboriginal staff play an important role in ensuring that Aboriginal clients feel comfortable, supported and culturally safe.³⁷ To support cultural safety, concerted effort is required to increase the pool of qualified and skilled Aboriginal practitioners to work with men using violence in the NT.

Recommendations

33. Fund No to Violence to work in partnership with Tangentyere Council and Catholic Care to roll-out training for ACCOs, service providers, and other community-based organisations to ensure perpetrators can access high-quality, culturally safe, evidence-based programs from appropriately trained facilitators and providers.

³⁶ Heather Anderson, "'It's Good to Know Each Other, to Be Kungas': An Evaluation Report for the Kunga Stopping Violence Program January 202' (North Australia Aboriginal Justice Agency (NAAJA), 2021); Margaret Kertesz et al., 'Women Who Use Force: Final Report of the 2018-2020 Perpetrators Package - Female Perpetrators Activity: Department of Social Services' (University of Melbourne and Curtin University, 2020).

³⁷ Spangaro, J. et al. (2016) "'They aren't really black fellas but they are easy to talk to": Factors which influence Australian Aboriginal women's decision to disclose intimate partner violence during pregnancy', *Midwifery*, 41, pp. 79–88. Available at: <https://doi.org/10.1016/j.midw.2016.08.004>.

34. Invest in specialised and culturally-specific men’s family violence training to expand the number of Aboriginal practitioners who are qualified and skilled to work with Aboriginal perpetrators of family violence

Establishing a centralised state-wide referral system for people who use family violence

Ending family violence necessitates connecting perpetrators with the supports and services they need to change their behaviours. Proposals LR 40 and SR 15 are important starting points—but these reforms should be expanded to include perpetrators.

No to Violence has operated the Men's Referral Service (MRS) for approximately 30 years. We know the critical importance of connecting men using or at risk of using violence with the services they need to start them on their behaviour change journey. An NT based office of No to Violence Men’s Referral Service would provide much needed specialist support to men at risk of, or who use, violence in their family settings.

Furthermore, No to Violence currently provides supports formal referral processes between NSW, Victoria, and Tasmanian Police Services to provide direct, automatic referrals for people identified as using family violence into the MRS. No to Violence would welcome the opportunity to develop an automatic referral pathway program with NT Police to connect men who use family violence directly to support services. As part of a whole of system approach to family support and risk mitigation, engaging with men who use violence upholds victim-survivor safety. The outreach service provides the opportunity to provide support and referral to men at the time they need it most.

The MRS has a proven track record of working with police in multiple states to connect men to the services they need, at the time they need them. This includes referring men to men’s behaviour change programs, and other interventions and support services including AoD programs, or mental health services, counselling, and housing services. In Victoria No to Violence operates the Brief Intervention Services a short-term, multi-session counselling service for men who are waiting to participate in an appropriate behaviour change program. This ensures he is connected with a service, interrupting his behaviours and connecting him with support at a critical time for the family’s safety and wellbeing. Given the limitations on service providers in the Territory, the roll-out and expansion of a program like the Brief Intervention Service should be explored.

No to Violence is aware of the some of the complexities of managing a telephone referral service for men and families in remote and very remote locations. Our member in Alice Springs, Tangentyere Council, successfully maintained telephone engagement with their community during COVID-19. A more plausible solution for communities located in remote and very remote locations might include co-location of Men’s Referral Services counsellors in established regional offices, working closely with police located in such areas to facilitate community connections and referral pathways. Community-led discussions about how to best deliver such services is recommended.

Overall, No to Violence recommends LR 40 and SR 15 be expanded to include referral for people who use violence.

Establishing a NT based men’s referral service is an important component of this reform agenda but must be accompanied by fully resourced and universally accessible services across the entire range of human services.

Recommendations:

35. Expand LR 40 to include a mandatory requirement that police refer alleged perpetrators to the Men's Referral Service and SR 15 to include funding for the establishment of a local office of NTV's Men's Referral Service to provide support and referral services for perpetrators
36. No to Violence proposes co-locating an MRS counsellor with the Tangentyere Council to increase the likelihood that Aboriginal men can utilise the service.
37. Create and provide training in mandatory referral procedures for NT Police to refer perpetrators of domestic and family violence to the Men's Referral Service
38. Ensure there are adequate and appropriate services for MRS to refer perpetrators into

Pilot new and innovative programs to address multiple drivers of violence

It is impossible to address family violence without addressing social housing. NTCOSS' submission to the Parliamentary Inquiry into Domestic, Family, and Sexual Violence noted the intersection between family violence, homelessness, and rurality. NT Shelter recommended increased crisis accommodation and an effective homelessness strategy to address homelessness and overcrowding.³⁸ Crisis housing for men across various communities must be made available in efforts to address men's use of family violence and support their behaviour change journey.³⁹

Responding effectively to people who use family violence requires wrap around services and case management. When men finish MBCPs—be they residential or community-based—they are generally exited into the same environment that enabled their violence. It is important that men are supported into an environment which enables them to maintain their changed behaviour, including the availability of safe and appropriate housing as well as access to universal services like mental health service, AoD programs, and income support.

No to Violence, with the Salvation Army Crisis Service, successfully coordinates the Men's Accommodation and Counselling Service (MACS), a short-term housing and counselling service for men who have been excluded from the home, across Victoria. An evaluation by Ernst and Young of MACS, (previously the Perpetrator Accommodation and Support Service (PASS)), demonstrates that the program 'is performing an important role in addressing a service gap within the Specialist Family Violence (SFV) service system and is proving effective in providing temporary accommodation and associated supports to its target client cohort.'⁴⁰ Inability to find suitable alternative housing has been identified as a key reason that people who have been legally excluded from the home for family violence breach their orders.⁴¹ Providing perpetrators with short-term accommodation and connecting them in with evidence-based services has proven a successful and important intervention in Victoria. Given the housing crisis across the NT, one particularly acutely experienced by Aboriginal communities, the NT Government should consider piloting a program like MACS.

Recommendations

39. Support the expansion of Brief Intervention Service (BIS), or a similar program, to the Northern Territory to ensure men who are unable to immediately access programs

³⁸ NTCOSS, 'Inquiry into Domestic, Family and Sexual Violence - NTCOSS - Northern Territory Council of Social Service' (Northern Territory Council of Social Services (NTCOSS), 2020), <https://ntcoss.org.au/ntcoss-submissions/inquiry-into-domestic-family-and-sexual-violence/>; NT Shelter, 'Policy Statements - On Affordable Housing & Homelessness', *NT Shelter* (blog), 2022, <https://ntshelter.org.au/policy-statements/>.

³⁹ NT Shelter, 'Policy Statements - On Affordable Housing & Homelessness'.

⁴⁰ No to Violence, 'Evaluation of the Perpetrator Accommodation and Support Service' (No to Violence, 2021), 3, https://ntv.org.au/wp-content/uploads/2021/12/PASS-evaluation-report_FINAL_26-May-20212.pdf.

⁴¹ No to Violence, 'Evaluation of the Perpetrator Accommodation and Support Service'.

40. Pilot an expansion of No to Violence’s Men’s Accommodation and Counselling Service (MACS) to support men who have been excluded from the home to access the services they need while supported with suitable housing

Culturally safe responses and the Aboriginal Justice Agreement

Domestic and family violence reform should involve a commitment to culturally safe responses, especially within the justice system. Programs and services should be tailored to local communities, and to avoid stereotyping Aboriginal offenders, through working closely with Aboriginal elders and communities.⁴²

For this reason, alignment between any domestic and family violence reforms and Aboriginal Justice Agreement as outlined in Proposal SR 2 must be led by Aboriginal Territorians, be built on genuine and respectful active collaboration, and provide viable alternatives to the use of violence, including appropriate diversionary programs that do not involve a carceral response.⁴³

No to Violence recommends the development of a specific Aboriginal Family Safety Strategy, co-designed and implemented in partnership with Aboriginal people and Aboriginal Community Controlled Organisations, to ensure there is a dedicated response to family violence informed by genuine collaboration undertaken in a similar way to that being drafted to accompany the National Plan to End Violence Against Women and Children. Additionally, this strategy should involve all organisations, services and departments that respond to perpetrators and victim-survivors of family violence.

Recommendations:

41. Collaborate with Aboriginal communities and ACCOs to develop and implement a specific Aboriginal Family Safety Strategy, aligned with the Aboriginal Justice Agreement and the proposed Aboriginal-specific National Plan to end violence against women and children

Coercive Control Prevention and Systemic Reform

The Consultation Paper seeks feedback on whether the reform agenda should include the criminalisation of coercive control or that the creation of a specific offence be delayed until broader systemic reform is achieved. In principle, No to Violence is of the view that any efforts to criminalise coercive control within the NT must first be pre-empted by other legislative and systemic reforms to improve the justice response to DFV. Although the criminalisation of coercive control has the potential to greatly increase the safety of victim-survivors and provide greater acknowledgement of their experiences, it cannot – and will not – invoke a better response to domestic and family violence without being underpinned by other significant changes.

We note that the Commonwealth has released its Draft National Principles on Coercive Control, and that a similar proposal for the introduction of a new standalone offence is being contemplated in most States and Territories. No to Violence will endeavour to provide a full response to this proposal within a supplementary submission, which focuses on legislative responses to domestic and family violence in the Northern Territory. This will include an analysis of the benefits and risks of a coercive control offence, its unintended consequences, and ways to mitigate specific harms faced by communities who have historically faced numerous challenges by the criminal justice system.

⁴³ Department of the Attorney-General and Justice 2021.

Consequently, our focus for this submission will remain on the proposals indicated in Section 5.1 of the Review. It is important to distinguish between reforms that should precede the introduction of a coercive control offence, and latter reforms that support its implementation. However, we strongly advise that efforts to criminalise coercive control and all associated reforms must be informed by meaningful, thorough consultation with Aboriginal people to ensure that efforts to address domestic and family violence do not further entrench existing systemic inequalities. No to Violence supports of the full implementation of Proposals SR 11, 12, 13, 21 and 22 as detailed throughout this submission.

Proposal SR 6

In principle, No to Violence supports the decision to have the DFSV-ICRO tasked with driving the implementation of reforms to combat coercive control in the context of strengthening the inter-agency response to DFV. Coercive control must be conceptualised and dealt with as an integrated element of DFV, and this understanding should be embedded across all agencies that interface with victim-survivors and perpetrators of family violence.

A successful reform agenda requires a significant degree of oversight. For example, the raft of reforms that arose from the Victorian Royal Commission remain under the oversight of the Family Violence Reform Advisory Group (FVRAG) and the Family Violence Reform Implementation Monitor (FVRIM), of which No to Violence is an active participant. We are pleased to note that the NT government is already considering a sophisticated response to inter-agency collaboration, including accountability measures for the effective implementation of domestic and family violence reforms.

Proposals SR 7

SR 7, which aims to raise community awareness about coercive control in Aboriginal families and communities, should be delayed until after other systematic reforms are implemented. Implementing a community awareness campaign before other vital reforms take place would increase burdens on a service system that is already stretched to capacity and struggling to meet demands. As referenced in earlier parts of this submission, there are currently not enough MBCPs available to support an informed response to people using coercive control. Additionally, such a campaign should follow concerted efforts to undertake the actions within the Aboriginal Justice Agreement, to ensure that communities have viable alternatives to the justice system available and adequate access to specialist support.

However, we encourage the NT government to revisit the idea of a community awareness campaign following the expansion of the specialist domestic and family violence sector, including by increasing the number of culturally safe and appropriate MBPs, and efforts to promote healthy relationships (SR 9).

Proposal SR 8

No to Violence supports of the prioritisation for training for the criminal justice system, including police. However, we note that one-off training is not sufficient for justice services; it must be ongoing and cover the gendered nature of domestic and family violence, systems abuse tactics used by perpetrators, and the cumulative impact of all forms of violence and abuse. We recommend that training is delivered by specialist domestic and family violence professionals and involve co-production between victim-survivors, the sector, and police.

Proposal SR 9

No to Violence, in principle, supports the consideration of a major NT wide public health campaign to increase awareness of coercive control. However, as stated in our response to SR 7, this campaign should not precede other systemic reform aimed at improving the capacity and availability of support services and improving the overall criminal justice response to domestic and family violence.

Recommendations:

42. Prioritise the training of the criminal justice system by implementing SR 8:
 - a. Ensure this training is delivered by specialist domestic and family violence professionals and involve co-production between victim-survivors, the sector, and police.
43. Prioritise Proposals SR 11, 12, 13, 21 and 22 prior to implementing Proposals SR 7 and 9 to bolster the capacity and availability of support services and improve the overall criminal justice response to domestic and family violence

Conclusion

No to Violence commends the NT Government for commencing this consultation process on improved responses to the experience and the use of family and domestic violence. We look forward to providing a more nuanced response to the question of criminalising coercive control in our supplementary submission.

However, any consideration of the introduction of new criminal offences must be pre-empted by strong, intentional systemic reforms aimed at improving overall responses to victim-survivors and perpetrators of domestic and family violence. Any reform should be guided by lengthy and active consultation with Aboriginal communities and advocacy organisations to guard against unintended consequences.

Improving the overall system will improve outcomes for victim-survivors and ensure perpetrator responsibility and accountability. We look forward to further discussing how the criminalisation of coercive control may fit within this agenda, and to providing further feedback and support to the NT government.

Appendix A: Forms of abuse

Spiritual abuse

Spiritual abuse or coercion is of particular concern for Aboriginal communities, but also for any victim-survivors who engage in spiritual or religious practices. During our consultation with Aboriginal

representatives and members, the idea of spiritual abuse and/or coercion was emphasised as particularly important. Examples included threatening to remove an Aboriginal woman from Country or preventing her from accessing Country or cultural events. For non-Indigenous Australians, spiritual coercion may include being prevented from attending places of worship or from engaging in specific practices or rituals (e.g. prayer). Spiritual abuse must be included in a complete definition of an act of abuse, as it is a clear establishment of control over a victim-survivor's spiritual or religious life.

Aboriginal people's specific experiences of abuse

Coercive control legislation must recognise Aboriginal peoples' specific and varied experiences of abuse. Participants in the No to Violence Aboriginal forum emphasised the complex and varied nature of abuse in their communities, including situations where an abuser excludes the victim-survivor from fully engaging within their community.

Deprivation of liberty within a cultural context

People from migrant and refugee backgrounds experience targeted forms of coercive control that deprive them of their liberty and agency and must be understood and factored into any formulation of a legislative solution. Participants in No to Violence's migrant and refugee forum on coercive control stated that victim-survivors experience coercive control in unique ways that impact their overall agency. Such experiences include dowry control; weaponizing visa status (including mistrusts) and threats to 'report them to Home Affairs' to control their behaviour; and the use of extended family and community to perpetuate forms of abuse (e.g. isolation). The threat of deportation of victim-survivors on a spousal visa was suggested as being a particular concern for victim-survivors in these communities. Importantly, participants believe the result of coercive control is significant 'psychological damage' and 'damage to sense of self'.

Abuse specific to LGBTIQ+ communities

LGBTIQ+ communities similarly experience specific forms of coercive control that, while broadly covered in the proposed legislation, require more nuanced explanation. For example, in No to Violence's Roundtable that discussed the impacts of coercive control for LGBTIQ+ communities, participants identified several abusive behaviours specific to LGBTIQ+ relationships: body shaming around the presentation and expression of gender identity; vilification of diverse gender expression; threats to out a person's gender identity, sexual orientation or HIV status; using the lack of LGBTIQ+ support services to undermine a partner; asexual experiences of "coerced consent" around undesired sexual interactions; and medical coercion such as someone pressuring their asexual partner to 'fix' their asexuality through medical intervention. Consequently, the proposed legislation must identify patterns of abuse that recognise and respond to these diverse experiences in LGBTIQ+ relationships.

Abuse specific for people living with disabilities and their families

People living with disability are at a heightened risk of experiencing coercive control from their intimate partners and family members. They are more likely to experience all forms of physical, psychological and sexualised violence, as well as unique forms of violence, than are experienced by people who do not live with disability, including specific acts such as withholding of important medications, restricted access to mobility aids and communication devices, as well as neglect and poor care. Participants in No to Violence's consultation forum on coercive control with people living with disability spoke about abuse specific to their community. Emphasis was placed on the institutions and organisations that enable and house abusers, especially by positioning perpetrators as a person's primary carer, or as partner to the primary carer (i.e., when the primary carer is a biological mother,

and a father/boyfriend/partner is the abuser). The proposed legislation must specifically acknowledge the unique forms of violence perpetrated against people with disabilities.

Technology-facilitated abuse

Technology-facilitated abuse is an increasingly insidious form of gendered violence. Recent research produced by ANROWS in 2021 demonstrates that women are overwhelmingly the target of online forms of abuse, and that technology-facilitated abuse is a growing concern for people experiencing family violence. Technology-facilitated abuse includes but is not limited to receiving abusive messages or calls; account take-overs; image-based abuse; fake social media accounts being used to harass or intimidate a person; and, being tracked through a phone or device using spyware or other GPS technology. There is a pressing need to carefully consider the role technology-facilitated abuse can play in coercive control, especially as new opportunities for abuse are created in our changing digital landscape. For example, harassing and repeated text messaging is now a common feature of controlling behaviour in abusive relationships. In one particularly illustrative case from Queensland, a woman contacted police after receiving in excess of 300 messages from her partner during a 12-hour period. This behaviour was not correctly identified as cause for concern and no police intervention was made. The perpetrator's abusive behaviour escalated, and he ultimately murdered his partner. This devastating outcome provides an important example of how technology-facilitated abuse can be part of patterns of coercive control, and why it should be considered in legislation criminalising this behaviour.

Threatening or attempting suicide or self-harm

Threatening or attempting suicide is a common feature in many cases of coercive and controlling behaviour. Men often use such threats to deter their partners from leaving; from reporting their violence; or from seeking help or community. Embedding this in legislation would enable family violence services to better establish patterns of behaviour.

Appendix B: Systemic Reform Proposals

NTV support for Northern Territory Systemic Reform Proposals		
Systemic Reforms	Text	NTV Support
SR 1	It is proposed that the systems reforms identified in this review are integrated into the DFSV-ICRO reform agenda.	Yes
SR 2	It is proposed that DFV reforms and AJA reforms are aligned to ensure that: <ol style="list-style-type: none"> the views and experiences of Aboriginal people inform DFV reforms; DFV responses and programs are culturally safe and competent; victim-survivor safety is the first priority of all responses and programs; offenders are supported to take responsibility for their behaviour and to change their behaviour in order to reduce DFV offending and reoffending; in addition to behaviour change objectives, there are culturally appropriate supports in place to ensure that Aboriginal women, Aboriginal men, and Aboriginal children are supported to heal from inter-generational trauma and recent trauma. 	Yes
SR 3	It is proposed that reforms to community-based sentencing options and the expansion of programs: <ol style="list-style-type: none"> are informed by specialist expertise on DFV, and include safeguards to monitor and prioritise the safety of victim-survivors while DFV offenders are on community-based orders and participating in community-based programs. 	Yes
SR 4	It is proposed that the DFSV-ICRO (and the DFV inter-agency co-ordination mechanism which succeeds it) co-ordinates a DFV analysis of proposed new Government initiatives.	Yes
SR 5	It is proposed that collaboration between stakeholders occur to agree on shared expectations of the justice response, with the above expectations as a starting point for discussion.	Yes
SR 6	It is proposed that the DFSV-ICRO be tasked with driving the implementation of reforms to combat coercive control in the context of strengthening the inter-agency response to DFV.	Yes
SR 7	It is proposed that the DFSV-ICRO reform agenda include consideration of funding for TFHC to implement an extensive program of community awareness raising about coercive control and DFV. The project will empower Aboriginal families and communities to identify, prevent and respond to coercive control through culturally safe and appropriate community-level engagement. The project aims to initiate greater community action on DFV and coercive control on an ongoing basis, through a range of non-government agencies and through involvement of the Law and Justice Groups, established under the AJA.	Yes
SR 8	It is proposed that the DFSV-ICRO reform agenda include consideration of funding to significantly expand the availability of training in relation to DFV, including training and education specifically tailored to police, prosecutors, judges, lawyers and front-line workers to assist in identifying and responding to coercive control and DFV.	Yes
SR 9	It is proposed that the DFSV-ICRO reform agenda include consideration of a major NT-wide public health campaign about healthy and safe relationships, to make people aware that coercive control is a form of DFV.	Yes

SR 10	<p>It is proposed that the NT progressively work towards a specialist approach to DFV (incorporating civil and criminal law) centred around the Local Court in the following areas:</p> <p>Southern Region</p> <ul style="list-style-type: none"> • continuation of the Specialist Approach in Alice Springs • commence discussions in Tennant Creek <p>Northern Region</p> <ul style="list-style-type: none"> • commence discussions in Darwin • commence discussions in Katherine <p>It is further proposed that:</p> <p>a. The specialist approach to DFV be permitted to evolve in each location to take into account local needs and circumstances but that it be guided by a set of Territory-wide overarching shared principles to ensure consistency and co-ordination and to align with good practice.</p> <p>b. The DFSV-ICRO reform agenda include consideration of funding for a DFV Coordinator/Registrar position in each Local Court (other than Alice Springs which already has that position) and a central position in the AGD dedicated to support the development of the response.</p> <p>c. The Specialist Approach to DFV in the Local Court in Alice Springs continue and that the DFSV-ICRO reform agenda include consideration of funding to strengthen its approach in line with its Internal Evaluation Report.</p> <p>d. AGD identify funding to conduct the three-year external evaluation of the Specialist Approach for the period July 2020 to June 2023.</p> <p>e. The Local Court commence discussions with key stakeholders about the establishment of a Specialist Approach to DFV in the Local Court in Darwin, Katherine and Tennant Creek.</p> <p>f. AGD consider how a more integrated specialist approach can be fostered in bush courts, and that this be done in collaboration with the Aboriginal Justice Unit, as part of the Aboriginal Justice Agreement.</p> <p>g. The DFSV-ICRO reform agenda include consideration of funding for a comprehensive training package on DFV for all personnel working in the justice system, including both introductory and advanced courses.</p> <p>h. The DFSV-ICRO reform agenda include consideration of funding for additional specialist DFV training for judges, with a two-tiered approach:</p> <ul style="list-style-type: none"> - advanced understanding of the dynamics of DFV; - best practice court craft and a trauma-informed approach to handling DFV matters in court. 	Yes
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SR 11	<p>It is proposed that the Commissioner of Police – in collaboration with the DFSV-ICRO and informed by consultation with DFSV specialists – revise the police General Order on DFV and other relevant policy and procedures to:</p> <ul style="list-style-type: none"> a. convey a contemporary understanding of DFV, that reflects the centrality and seriousness of coercive control and psychological abuse; b. assist police officers to identify the ‘red flags’ for coercive control; c. assist police to identify and manage the high risk factors associated with DFV in a way that is aligned with the NT’s Risk Assessment and Management Framework (RAMF) including: <ul style="list-style-type: none"> i. history of DFV between the parties; ii. coercive control; iii. choking; iv. threats to kill; v. pregnancy of new birth; vi. actual or pending separation; d. guide police officers on when to initiate a Police DVO; e. guide police in identifying the person most in need of protection where there are mutual allegations of violence or signs that both parties may have used violence (also a process for an internal review where mutual DVOs are being considered); f. guide police in relation to appropriate responses to intoxicated victim-survivors (to prioritise safety and so that the best practice response is not downgraded if victims are intoxicated); g. encourage the use of recorded statements for victim evidence where possible; h. guide police responses in remote contexts where there are limited services and options for safe accommodation available. <p>It is further proposed that the police General Order on DFV – or a summary of police procedures in responding to DFV – is made available to DFV service providers to facilitate continuous improvement of inter-agency responses to DFV.</p>	Yes
SR 12	<p>It is proposed that a review of police training on DFV be conducted to bolster the training with respect to DFV and coercive control. Consideration should be provided to:</p> <ul style="list-style-type: none"> a. compulsory training for all police officers in the NT; b. high level training for selected officers; c. the identification of selected police members as DFV champions to foster best practice through NT Police (see the Scottish model). <p>It is further proposed that the review be jointly conducted by the DFSV-ICRO and the police Training and Assessment Advisory Committee (TAAC), and include representation from Police with a high level of DFSV experience and DFSV experts outside of NT Police.</p>	Yes
SR 13	<p>It is proposed that NT Police, in collaboration with DFSV-ICRO, institute effective practices to assess and manage risk associated with DFV that are aligned with the NT’s Risk Assessment and Management Framework (RAMF), including:</p> <ul style="list-style-type: none"> a. At the scene, <ul style="list-style-type: none"> i. ensure the immediate safety of alleged victims, alleged offenders and children, ii. ensure that the parties are interviewed separately to accurately identify risk in the context of the relationship overall. b. Develop a modified CRAT specifically for frontline police to assist them to accurately assess and manage risk of harm, or further harm, from DFV during operational duties that: <ul style="list-style-type: none"> i. is aligned with, and informed by, the RAMF/CRAT, ii. assists frontline police to accurately identify the person most in need of protection, iii. meets police requirements and is compatible with the existing police IT systems (Promise/Serpro), iv. minimises administrative burden for frontline police officers, v. is incorporated into the NT Police Minimal Response c. Continue to use the CRAT to identify victims at risk of serious harm for referral to the Family Safety Framework inter-agency response. 	Yes

SR 14	<p>It is proposed that, in accordance with the proposed legislative amendments (see proposal LR 11 above), the Commissioner of Police require police to provide a certificate to the Court at the first mention in all applications for DVOs, that summarises the defendant's criminal history and a history of all DVOs that have been in force, in accordance with the legislative amendment.</p> <p>It is further proposed that this be an automated system in similar terms to the generation of criminal histories to ensure the certificates can be generated efficiently by police with minimal administrative burden. Alternatively the process could mirror to current practice for the production of antecedent reports for courts in criminal matters.</p>	No
SR 15	<p>It is proposed that the DFSV-ICRO reform agenda include consideration of funding for TFHC to establish a 24 Hour DFV Specialist Referral Service and that TFHC and NTPFES via the DFSV-ICRO develop an appropriate service model so the service operates effectively across all the regions of the NT and in urban and remote community settings.</p>	Yes
SR 16	<p>It is proposed that the resourcing of the Witness Assistance Service at the Director of Public Prosecution be reviewed by the DFSV-ICRO to determine if it is adequate in light of the current level of DFV offending and the needs of complainants in DFV and sexual offences.</p>	Yes
SR 17	<p>It is proposed that AGD, in collaboration with the DFSV-ICRO, identify the best way to provide prosecutors with specialist training on DFV and sexual assault.</p>	Yes
SR 18	<p>It is proposed that as part of the DFSV-ICRO reform agenda, AGD review the capacity of legal services to provide legal assistance to protected persons and defendants in proceedings under the DFV Act, with a view to:</p> <ul style="list-style-type: none"> a. strengthening the provision of legal advice and assistance for protected persons in DVO proceedings; b. introducing a service in Alice Springs to provide legal advice, assistance and support to male defendants in DVO proceedings; c. identifying other service gaps in relation to legal assistance for proceedings under the DFV Act. 	Yes
SR 19	<p>It is proposed that as part of the DFSV-ICRO reform agenda, AGD review the capacity of legal services to provide legal assistance to protected persons and defendants in proceedings under the DFV Act, with a view to:</p> <ul style="list-style-type: none"> a. strengthening the provision of legal advice and assistance for protected persons in DVO proceedings; b. introducing a service in Alice Springs to provide legal advice, assistance and support to male defendants in DVO proceedings; c. identifying other service gaps in relation to legal assistance for proceedings under the DFV Act. 	Yes
SR 20	<p>It is proposed that as part of the DFSV-ICRO reform agenda consideration be given to whether:</p> <ul style="list-style-type: none"> a. existing DFV support services for victim-survivors and defendants involved proceedings under the DFV Act at court are resourced adequately to meet current demand; b. an expansion of specialist DFV courts in the NT would require an increased capacity for support. 	Yes

SR 21	<p>It is proposed that DFSV-ICRO in collaboration with TFHC and AGD (including AJA and NTCS) give consideration to developing a costed plan to increase the availability of high quality DFV perpetrator programs in the NT. It is proposed that programs are:</p> <ul style="list-style-type: none"> a. aligned with recognised good practice and standards for DFV programs b. able to provide a culturally competent and cultural safe program for Aboriginal participants c. address all forms of abuse, including coercive control d. prioritise victim safety e. operate across three settings but with shared principles: <ul style="list-style-type: none"> i. correctional settings; i. residential facilities / Alternatives to Custody settings (For example the DFV Alternatives to Custody being developed as part of the AJU in Alice Springs); i. community based settings. 	Yes
SR 22	<p>It is proposed that DFSV-ICRO give consideration to establishing a multi-agency oversight committee or body comprised of key agencies (TFHC, AGD, AJU, NTCS) and DFV experts whose purpose is to ensure a suite of accountable high quality DFV perpetrator programs are provided in the NT that prioritise victim safety and offender accountability. The committee or body may include a review of existing programs, development of best practice standards, and recommendations as to which programs should be declared or approved for the purposes to the DFV Act and the Sentencing Act 1995.</p>	Yes
SR 23	<p>It is proposed that the DFSV-ICRO reform agenda include consideration of funding for TFHC to significantly expand the implementation process and training for the NT's DFV Risk Assessment and Management Framework (RAMF) to ensure that the approach to DFV risk assessment and management is consistent across the system, and that coercive control is recognised as a predominant feature of DFV.</p>	Yes
SR 24	<p>It is proposed that the DFSV-ICRO reform agenda include consideration of strengthening the Family Safety Framework (FSF) as an action based, integrated, multi-service response for women experiencing or at risk of experiencing serious harm or death because of DFV.</p>	Yes
SR 25	<p>It is proposed that TFHC, in collaboration with DFSV-ICRO, give consideration to developing guidelines on how MACCST will deal with children exposed to, and affected by DFV, and their families, that is aligned with the NT's DFV Risk Assessment and Management Framework (RAMF). The guidelines should prioritise victim safety and offender accountability and include:</p> <ul style="list-style-type: none"> a. responses to children who are primary victims or otherwise exposed to DFV; b. responses to non-offending adults who are victims of DFV; c. responses to DFV perpetrators; and d. responses to the high risk factors outlined in the RAMF (these are summarised in Part 3.6 above). 	Yes
SR 26	<p>It is proposed that, as part of the DFSV-ICRO reform agenda, consideration be given to:</p> <ul style="list-style-type: none"> a. establishing a model for a systems-driven DFV Death Review Process in the NT; b. including consideration of funding to implement the model for a DFV Death Review Process in the NT; and c. linking the DFV Death Review Process to the ongoing inter-agency leadership and governance structure for DFSV going forward. 	Yes