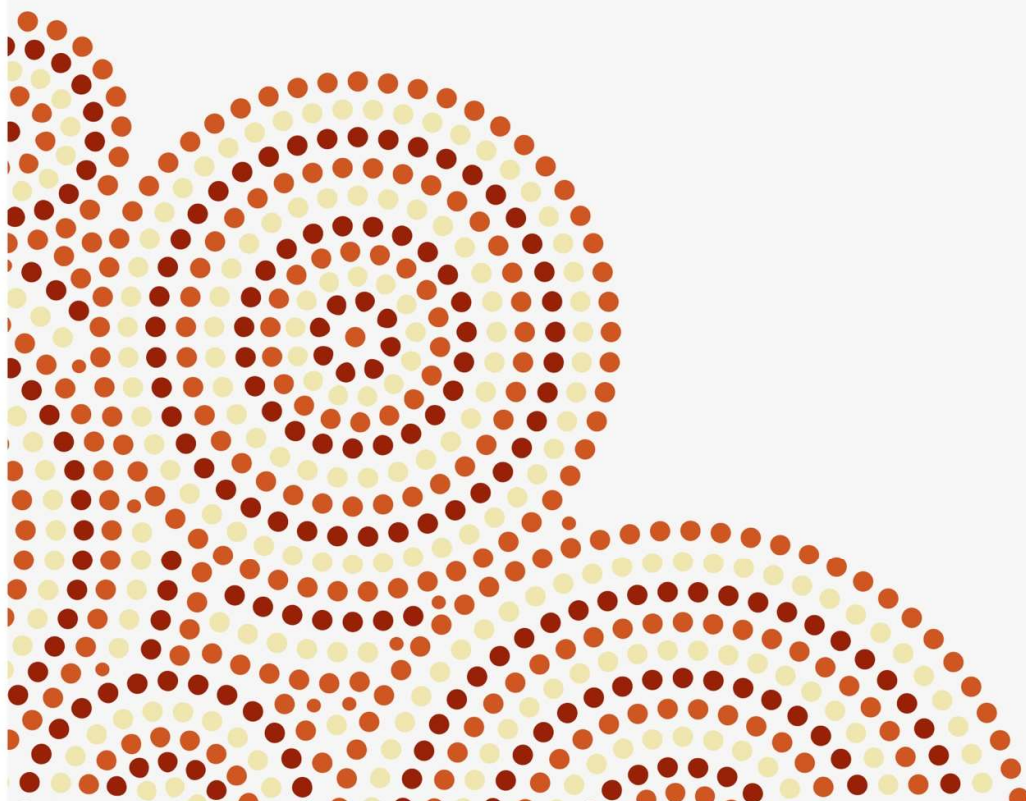


TANGENTYERE
COUNCIL
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House of Representatives Inquiry into Homelessness in Australia



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1.Executive Summary

Tangentyere Council Aboriginal Corporation (TCAC) welcomes the opportunity to respond to the House of Representatives Inquiry into Homelessness in Australia.

This submission will consider the incidence of homelessness with respect to Alice Springs, its Town Camps and to a lesser extent the National Partnership Agreement for Remote Housing NT. The submission will also consider a finite number of factors that have a direct impact on the experiences of our stakeholders with respect to the issue of homelessness.

A more detailed response was planned but in recognition that the deadline for submissions has now passed a more truncated response is now offered. It is hoped that there will be an opportunity for a supplementary submission to be provided.

Our response to the Terms of Reference is not exhaustive but items have been selected by TCAC as they may not have been be considered elsewhere. It should be noted that these determinants reflect issues arising on the Town Camps but that there are likely to be experienced throughout the National Partnership Agreement for Remote Housing NT (NPA) Footprint. It is also likely that these determinants are also relevant to residents of the Northern Territory Homelands and Urban Public Housing in regional centers.

At the time of writing this submission, TCAC awaits some feedback from the Northern Territory, Department of Local Government, Housing and Community Development concerning the homelands and the Australian Bureau of Statistics (ABS) regarding population estimates for the NPA Footprint. This data may form the basis for a supplementary submission. This data will be linked to the commitments made by the Commonwealth and the Territory with respect to the constructions of additional dwellings throughout the NPA Footprint. It is also likely that these estimates will be used as the basis of some separate recommendations about estimates of population and mobility.

2.Background

TCAC is an Aboriginal Community Controlled Organisation (ACCO) delivering human services for the benefit of Aboriginal people from Alice Springs, its Town Camps and Central Australia.

TCAC has 16 Town Camp Corporate Members, over 600 Individual Members and provides services to more than 10,000 people from a region that covers approximately 873,894 km².

The TCAC Board of Directors (BoD) is composed of the elected Presidents of the 11 Town Camp Associations and 5 Aboriginal Corporations.

The work undertaken by TCAC is aligned with action on the social, environmental and behavioural determinants of health and wellbeing. Programs delivered throughout Central Australia include: (1) Child Protection and Wellbeing; (2) Children and Schooling; (3) Community Safety; (4) Alcohol and Other Drugs; (5) Tenancy Support; (6) Employment; (7) Aged and Disabled; (8) Chronic Disease Care Coordination; (9) Family Violence Prevention; (10) Housing Maintenance; (11) Municipal and Essential Services; (12) Construction and (15) Art and Culture.

TCAC was formed to assist Town Campers to gain legal tenure and in order to obtain water, electricity and housing. From 1979 until December 2009 TCAC operated as an Aboriginal Community Controlled Housing Organisation (ACCHO) and service provider.

In 2009, 11 Town Camp Housing Associations and 3 Town Camp Aboriginal Corporations executed Tripartite Alice Springs Living Area Subleases with the Executive Director of Township Leasing (EDTL) on behalf of the Commonwealth and the CEO of Housing on behalf of the Territory. The EDTL then entered a Housing Management Agreement (underlease) with the Northern Territory Government making the Department of Local Government, Housing and Community Development (DLGHCD) the Housing Authority for the Town Camps. The execution of these agreements was agreed to on the threat of compulsory acquisition. The execution of these agreements also paved the way for the investment of \$100,000,000 for the improvement of housing and infrastructure as part of the Strategic Indigenous Housing and Infrastructure Program (SIHIP).

Despite the changed leasing arrangements, TCAC and its Corporate Members; subsidiary and related parties retain an active role in Property and Tenancy Management; Tenancy Support; and Environmental Health.

TCAC founded Sonwane Pty Ltd Trustee for Tangentyere Charitable Trust Number 2 T/A Tangentyere Constructions in 1999. Tangentyere Constructions is a CAL Accredited Member of the Master Builders Association of the NT. Tangentyere Constructions delivers Property Management contracts employing Housing Maintenance Officers (HMOs) to deliver services on the Town Camps and 11 Remote Communities. HMOs provide assessment and undertake works of less than \$100 in respect of 'Responsive Repairs and Maintenance'. Tangentyere Constructions is also on a Panel for the Provision of Trade Qualified Repairs and Maintenance Works for the Town Camps and 22 Remote Communities.

TCAC founded CAAHC in collaboration with the Central Land Council, Health Habitat and MLCS Corporate in 2009. CAAHC was the first National *Regulatory System for Community Housing* (NRSCH) Accredited Community Housing Provider (CHP) and delivers Tenancy Management on the Town Camps as a contractor for the DLGHCD. Since 2009, CAAHC has also established its own community housing portfolio through a range of property development activities and leasing and management partnerships. Including the Town Camps, CAAH now manages over 370 properties in Alice Springs.

The TCAC response to the House of Representatives Inquiry into Homelessness in Australia is primarily informed by the work of the organisation on the Town Camps and in Central Australia.

3. Incidence of Homelessness

There are several contemporary definitions of homelessness (Chamberlain, 2014)ⁱ. The ABS statistical definition was constructed from a framework that includes three core elements (Chamberlain, 2014). These three core elements include: (1) dwelling adequacy; (2) security of tenure; and (3) control of and access to space (Chamberlain, 2014).

Other definitions consider cultural elements of homelessness (Chamberlain and MacKenzie 1992)ⁱⁱ. The fundamental contention underpinning the cultural definition is that 'homelessness' is a relative concept that acquires meaning in relation to the housing conventions of a particular culture (Chamberlain, 2014). These definitions are valuable but may not adequately explain how the interface between different systems contributes to housing vulnerability and homelessness in Central Australia.

The ABS outlines that estimates of total homelessness as published in the Census of Population and Housing: Estimating Homelessness are based on the sum of the following six operational

groups: (1) persons living in improvised dwellings, tents, or sleeping out; (2) persons in supported accommodation for the homeless; (3) persons staying temporarily with other households; (4) persons living in boarding houses; (5) persons in other temporary lodgings; and (6) persons living in 'severely' crowded dwellings (ABS, 2020)ⁱⁱⁱ.

In 2005 the Tangentyere Council Research Hub undertook a Population and Mobility Study. The use of local Aboriginal people to conduct this research meant that residents were prepared to share information (Foster et al, 2005)^{iv}. According to the data collected by the TCAC Research Hub the average house had 10 residents and accommodated 17 individuals when including visitors (Foster et al, 2005). The total resident population was estimated to be 1,950 and service population was 3,301 (Foster et al, 2005). The number of dwellings has expanded from 199 to 284 since this work was undertaken.

The fact that this estimate contrasts with the ABS estimate of 882 for the Town Camps has been the matter for some discourse between TCAC and the ABS. The two organisations are planning to collaborate on strategies for the improvement of data collection. It is recognised by TCAC that the model of remote public housing and rent collection influences the preparedness for people to report additional household members to government agencies.

Rental debt is a significant issue and the improvement of the model has been identified as a high priority. Interestingly the issue of the rent model and the associated issue of rental debt has led to a circumstance whereby people are reluctant to reflect the true number of residents and visitors to government agencies for fear of penalty. This disguises the true extent of the issue of overcrowding.

4. Factors Affecting the Incidence of Homelessness

This submission will consider a finite number of factors that have a direct impact on the experiences of our stakeholders with respect to the issue of homelessness.

The following list is by no means exhaustive but has been selected by TCAC as it may not be considered elsewhere. It should be noted that these determinants reflect issues arising on the Town Camps but that there are likely to be experienced throughout the National Partnership Agreement for Remote Housing NT (NPA) Footprint.

4.1. Poverty and Rental Debt

Households with rental debt are vulnerable households. The prevalence of rental debt in remote public housing including the Alice Springs Town Camps and the other National Partnership Agreement for Remote Housing NT (NPA) communities highlights the systemic failure of the current rent model.

TCAC wrote to the Department of Local Government, Housing and Community Development (DLGHCD) on Friday, 1st November to request a response to the following four questions: (1) What is the total number of Public Housing dwellings? (2) What percentage of Public Housing dwellings are tenanted? (3) What percentage of Public Housing tenancies have a debt with the DLGHCD? (4) What is the average dollar value of Public Housing tenancy debt? TCAC requested this information for Alice Springs and its Town Camps; and NT Urban and Remote. The DLGHCD provided a response to 3 of the 4 questions on Wednesday, 6th November.

The following table outlines the number of dwellings, the proportion of tenanted dwellings and the proportion of tenanted houses with a rent related debt. This data is for Alice Springs and its Town Camps; and NT Urban and Remote Public Housing:

		Town Camp		Urban		Total	
Location	Dwellings	%	#	%	#	%	#
Alice Springs	Total		284		773		1057
	Tenanted	89%	253	92%	711	91%	964
	Rent Debt	62%	176	34%	263	42%	439
		Remote		Urban		Total	
NT	Total		5209		4914		10123
	Tenanted	93%	4844	96%	4717	94%	9562
	Rent Debt	85%	4428	25%	1229	56%	5656

The DLGHCD was not able to provide a monetary average value for these debts. TCAC understands that this reflects several interrelated challenges. Each tenancy with rent related debt is vulnerable with its occupants at risk of rooflessness. The term rooflessness is used here as it cannot be assumed that these vulnerable tenancies are adequate. The tenants may therefore be considered homeless despite living in a home.

The DLGHCD provided some additional information tracking changes in the % of households with debt as a function of time. It is notable that the one region showing some improvement as a function of time is the Alice Springs Town Camps. TCAC, its subsidiaries and related parties are working to address household debt through programs including the Tenancy Support Service (TCAC) and Tenancy Management (CAAHC). Historically TCAC was funded to employ a Financial Counsellor, this role is critical but was no longer funded because of the consolidation of funding for Financial Counselling Services with larger NGOs operating in larger regions. TCAC has been fortunate to retain its Financial Counsellor in the capacity of Coordinator of Tenancy Support. This outcome has strengthened this service and contributed to reductions in the frequency and severity of debt.

		30th June				
		2015	2016	2017	2018	2019
Alice Springs	Town Camp	74%	69%	65%	63%	62%
	Urban	30%	26%	33%	31%	36%
NT	Remote	78%	87%	85%	83%	84%

The Town Camps and Remote NT have greater levels of DLGHCD related debt when compared with urban (Alice Springs and NT). It is not possible to provide a detailed analysis at this time but TCAC can make the following observations as follows: (1) Town Camp and Remote Housing tenants on income support participate in the Community Development Program (CDP); (2) Urban Housing tenants participate in Job Active and not CDP; (3) CDP activity requirements are far higher than those of Job Active; (4) Breaching rates amongst CDP participants are far higher than that of Job Active participants; (5) CDP breaches of income support contribute to debts; (6) Town Camps and Remote Communities have poor access to postal and internet services; (7) poor postal services have impacted on the completion of rental rebate renewal forms; and (8) failure to complete rental rebate renewal forms increases the likelihood and severity of debt. TCAC successfully demonstrated to the previous NT Government the impact of gaps in postal services. This changed the method of

rental rebate renewal delivery. TCAC also had some success in its advocacy for the extension of postal services. This extension is not yet complete

Rental debt places tenancies at risk. These rates of rental debt in the NT indicate that the issue is systemic in nature.

4.2. Current Rent Model

TCAC and its Corporate and Individual Members have concerns about rent affordability for residents of Urban, Town Camp and Remote Public Housing based on current levels of income support.

For the Town Camps (and Remote Communities) rent is currently based on the following table of maximum rents payable to the DLGHCD:

Remote Maximum Dwelling Rent				
Classification	4 Beds	3 Beds	2 Beds	1 Bed
New/Rebuilt	\$250	\$230	\$175	\$150
Refurbished	\$200	\$184	\$140	\$120
Existing	\$150	\$138	\$105	\$90

These maximum rents are significant when considered in the context of the current weekly single rate of Newstart which is \$278. TCAC acknowledges that rent is currently rebated to 25% of household income. On this basis a recipient of Newstart will be left with \$208.50 per week after paying rent. This amount is not enough to meet basic material needs let alone provide the basis for social and financial inclusion.

TCAC considers that such low rates of income support lead to a disparity between the number of individuals residing in dwellings and how this is reported (to the DLGHCD and other agencies). The number of tenants is far lower than the number of residents identified by TCAC and other Aboriginal Community Controlled Organisations (ACCOs) including Aboriginal Medical Services.

This mismatch may reflect a strategy for the minimisation of rent on the basis that people are struggling financially. The acknowledgment of more tenants means that the value of 25% of household income climbs toward the maximum rent value. More rent reduces the availability of financial resources for other material needs.

At present the true population of the Town Camps (and other locations) is hidden and is significantly underestimated. This masks demand for housing and services. Additionally, responsibility and risk are consolidated with a smaller number of residents than would otherwise be desirable.

The DLGHCD has undertaken a review of remote rent and has developed alternative models that may over time address the issues identified here. A model that recognizes the distinction between tenants, residents and visitors would be helpful. At present the model distinguishes between tenants and non-tenants, this dichotomy is problematic.

4.3. Transfer Processes

For traditional Aboriginal people mourning involves unique cultural observances including participation in 'sorry camp'. A key feature of sorry camp is that it provides "support to those who are most affected by the death" and that their loss is shared by their family and community (Glaskin et al, 2008)^v.

Staying “in sorry camps symbolizes the key mourners’ exclusion from normal life” and such observances can be for “substantial amounts of time” (Glaskin et al, 2008). The exclusion of mourners can present a challenge for the ongoing receipt of income support due to inflexible mutual obligation requirements. There is a significant gap between Centrelink policy and the lives of Aboriginal people. Fowkes observes that Aboriginal people receives penalties for non-compliance at 6 times the rate of non-Indigenous people (Fowkes, 2016)^{vi}.

In addition, there is a taboo that exists in relation to the continued occupation of a dwelling after a death. Edwards tells us that traditionally “brush shelters could be dismantled and burned” (Edwards, 2013)^{vii}. This treatment of dwellings has been modified with residents swapping houses (Edwards, 2013). Since the Northern Territory National Emergency Response, ACCHOs have increasingly been superseded by the Department of Local Government, Housing and Community Development (DLGHCD) as a landlord. Bureaucracy makes the transfer of houses difficult regardless of the circumstance precipitating the need.

4.4. Impact of Trauma

While the 5th Edition of the Diagnostic and Statistical Manual of Mental Disorders outlines the criteria for trauma as requiring individuals to be exposed to “actual or threatened death, serious injury, or sexual violence” (Association, 2013)^{viii} a broader view of trauma has been taken. Briere and Scott outline a “broader definition” that recognises an event as “traumatic if it is extremely upsetting and at least temporarily overwhelms the individual’s internal resources” (Briere and Scott, 2012)^{ix}. The recognition of the impact of threats to “psychological integrity” outlined in the work of Briere and Scott resonate with the local context (Briere and Scott, 2012).

The history of the Northern Territory (NT) has involved significant violence against the Aboriginal population. The last officially sanctioned massacre in the NT took place in Coniston in 1928 (Wilson and O’Brien, 2003)^x.

Judith Herman makes the point that ‘trauma is contagious’ (Herman, 2015)^{xi}. It appears evident that trauma, grief and loss from events such as the Coniston Massacre and the removal of children have been handed down through the process of countertransference as described by Herman (Herman, 2015). Colonisation has contributed to the loss of land, language and culture. Connection to land, language and culture are protective factors and their loss further exacerbates the impact of the traumatic events that have led to the displacement of Aboriginal people from their traditional lands (Aboriginal and Torres Strait Islander Social Justice Commissioner, 2009)^{xii}.

TCAC considers that several factors have continued to exacerbate levels of intergenerational trauma. An analysis of these factors is beyond the scope of our response, but it includes the following: (1) Family and Domestic Violence; (2) Alcohol and Other Drugs; (3) the NT National Emergency Response; (4) Racial Profiling; (5) Acculturation and Minority Stress; (6) Child Protection Interventions; and (7) contact with the Criminal Justice System.

The literature clearly points to the need for services to develop an approach that is trauma informed. Wall et al outlines that “there is a continuum from being trauma aware” to becoming “trauma-informed” (Wall et al, 2016)^{xiii}. Trauma-informed service delivery includes an understanding of the “impact of trauma”, knowledge of the potential pathway to recovery and an ability to recognise the “signs and symptoms of trauma” (Wall et al, 2016). Ideally this knowledge is underpinned and reinforced through “policies, procedures and practices” designed to minimise inadvertent injury and trauma whilst maximising recovery (Wall et al, 2016).

The “possibility of trauma in the lives of all clients/patients/consumers is a central organizing principle of trauma informed care, practice and service-provision” (Kezelman and Stavropoulos, 2012)^{xiv}. This

principle is appropriate to all service providers regardless of their role (Kezelman and Stavropoulos, 2012, p. 88). TCAC contends that this principle is frequently overlooked locally. Interventions that are not developed in the knowledge of the existence of trauma can compound existing issues (Quadara, 2015)^{xv}.

In becoming trauma-informed organisations should develop services and interventions that are trauma-integrated even when these services will not be directly tackling the issue of trauma (Quadara, 2015)^{xvi}. Trauma-integrated services are distinct from trauma-specific interventions which have been developed to enable recovery (Quadara, 2015).

4.5. Adequacy of Dwellings

TCAC acknowledges that there was a significant investment in Town Camp Housing and Infrastructure on the Alice Springs Town Camps as part of the Strategic Indigenous Housing and Infrastructure Program (SIHIP). This investment undoubtedly improved and increased the available housing stock. This does not however mean that the housing is adequate or suitable for the residents and the local environmental context.

4.5.1. Housing and Infrastructure Standards

TCAC is working with the University of Newcastle (UoN) School of Architecture and Built Environment (SABE) to develop a 'Guide to Housing and Infrastructure Standards for the Town Camps'. TCAC will recommend to the Commonwealth and Territory that a Review of Future Housing and Infrastructure Needs will be required to determine the quality of housing and infrastructure on the Town Camps. The proposed 'Guide to Housing and Infrastructure Standards for the Town Camps' will be valuable in setting a Terms of Reference for the proposed Review of Future Housing and Infrastructure Needs. Additionally, the 'Guide to Housing and Infrastructure Standards for the Town Camps' will support other work being undertaken by TCAC and other organisational actors working to deliver better housing and homelessness outcomes.

By partnering with the UoN SABE, TCAC is seeking to understand a range of issues including the relationship between building standards implemented as part of the Strategic Indigenous Housing and Infrastructure Program (SIHIP) and industry guidelines including the National Indigenous Housing Guide (NIHG). The NIHG outlines the principles of Safety and the 9 Healthy Living Practices (HLPs). Safety and the 9 HLPs were at the core of work undertaken by TCAC prior to the transition from the management of Town Camp Housing by TCAC an Aboriginal Community Controlled Housing Organisation (ACCHO) to Public Housing managed by the Department of Local Government, Housing and Community Development (DLGHCD).

Briefly the NIHG identifies the health hardware required to support the 9 HLPs as follows: (1) The ability to wash people, particularly children; (2) The ability to wash clothes and bedding; (3) Removing waste safely from the house and immediate living environment; (4) Improving nutrition: the ability to store, prepare and cook food; (5) Reducing the negative effects of crowding; (6) Reducing the negative contact between people and animals, insects and vermin; (7) Reducing dust; (8) Controlling the temperature of the living environment; and (9) Reducing trauma, or minor injury, by removing hazards.

The Post Occupancy Evaluation of Alice Springs Town Camp Housing 2008-2011 undertaken by the Centre for Appropriate Technology under the direction of TCAC found that the SIHIP guidelines prioritised 4 'Critical Healthy Living Practices', which are also the first 4 HLPs listed in NIHG (Centre for Appropriate Technology, 2013)^{xvii}. This means that the remaining HLPs were not prioritised. This has an impact on the adequacy of the dwellings, one that needs to be better understood.

TCAC is partnering with the UoN SABE in the development of the 'Guide to Housing and Infrastructure Standards'.

The 'Guide to Housing and Infrastructure Standards' will reference and contextualise the following documents as a starting point:

- The National Indigenous Housing Guide;
- The National Construction Code (NCC) 2019;
- Australian Standard for Adaptable Housing;
- The Livable Housing Guide;
- The Alice Springs Town Council Subdivision Guidelines

It is hoped that by undertaking this work that the mistakes of the previous review of Town Camps are not repeated.

According to Crabtree et al "under Clause 12 of the 40-year subleases, the NT Government is obliged to perform a review of the Camps every three years. The contract was awarded for \$2,400,000 to a private consultant with no track record in working with Northern Territory Town Camps. The tender was opened by the incumbent Country Liberal Party and the contract appears to have been awarded while the government was in caretaker mode for the 2016 election, potentially breaching legal requirements" (Crabtree et al, 2018)^{xviii}.

In May 2018 the final report from the work was released by the new Northern Territory Government. "The report runs to over 16,000 pages with no materials in community languages". The DLGHCD commissioned Deloitte Report titled 'Living on The Edge: Northern Territory Town Camps Review' does not consider climate change and heat mitigation as part of its assessment of the future housing and infrastructure needs of the Territory's Town Camps. The report does not even consider whether the houses have insulation, the most basic passive heating and cooling infrastructure.

TCAC considers that the Town Camp housing stock and by reasoned extrapolation the entirety of the 5,209 houses across the National Partnership Agreement (NPA) for Remote Housing NT does not perform well against the NIHG, NCC, the Australian Standard for Adaptable Housing; and the Livable Housing Guide.

TCAC recommends that the Standing Committee on Social Policy and Legal Affairs seek advice from the Northern Territory about the exclusions granted for the adherence of DLGHCD housing stock in remote areas. TCAC also recommends that the Commonwealth and NT Government determine some triggers for the assessment of compliance of housing to the NCC as part of the NPA. It is our understanding that building compliance is only considered for new and structurally upgraded dwellings. TCAC is not however certain that this is the case in remote areas where exclusions apply.

TCAC is also concerned about the impact of the built environment on Town Camps outside the households and their yards. At present the Town Camps do not achieve the standards required by the Alice Springs Town Council Subdivision Guidelines. This is an issue for residents with respect to environmental health; crime prevention through environmental design (CPTED); road safety; and for access to parks and playgrounds. These issues can be extrapolated to remote communities and outstations. Poor environmental health and CPTED directly impact on the outcomes of housing, health and wellbeing.

4.5.2. Energy Insecurity

Energy insecurity means that houses are rendered inadequate. It impacts food preparation and storage; the ability for people to wash; the capacity to wash clothes and bedding; the ability to modify internal ambient temperatures; access to communications; and access to recreational activities requiring electricity. Taken together or separately these issues directly impact health and wellbeing.

TCAC has been investigating the issue of energy insecurity as experienced by Jacana prepayment meter customers living on the Alice Springs Town Camps. The need for this work was identified by the Directors and Members of TCAC. TCAC approached the Minister for Renewables, Energy and Essential Services and Jacana in order that a mechanism be established so that prepayment meter data can be accessed with the consent of customers. Jacana is the NT Government Business Enterprise that interfaces with energy consumers living in areas with regulated power networks in the NT. TCAC has commenced the process of obtaining the consent of residents so that the data can be accessed and analysed. TCAC aims to seek the consent of most of the 285 Town Camp households before expanding the project to other localities.

The extent of energy insecurity as experienced by Jacana prepayment meter customers had already been validated by de-identified data provided by Jacana.

As at the 30th June 2019, 570 Alice Springs households had prepayment meters. Of these 570 houses 420 had at least one involuntary self-disconnection event for an average duration of 455 minutes (per event).

This data and the data for Darwin, Katherine and Tennant Creek is outlined in the following table.

Smart Prepayment Meters (PPM) April-June 2019					
	PPMs	PPMs Disconnecting		Mean Duration	
	#	#	%	Minutes	Hours
Darwin	457	331	72%	454	8
Katherine	834	413	50%	460	8
Alice Springs	570	420	74%	455	8
Tennant Creek	513	316	62%	480	8
Total	2374	1480	62%		

The overall details can be summarised as follows: in the final quarter of the 2018/19 financial year there were 2,374 Jacana prepayment customers living in Darwin, Katherine, Tennant Creek and Alice Springs. Of these 2,374 customers/households 62% (1,480) had at least 1 involuntary self-disconnection due to poverty. The average duration of these involuntary self-disconnections was ~8 hours.

TCAC predicts that a similar circumstance exists in the remote communities described here as NPA 'footprint' communities. The NPA 'footprint' is serviced by PowerWater subsidiary Indigenous Essential Services (IES) for the provision of essential services including power. TCAC requested a breakdown of dwellings by NPA 'footprint' community. This has been provided and is attached as Appendix 1. TCAC was advised that the total number for the NPA 'footprint' community dwellings was 5,099 on the 1st July 2020. 4,815 of these households are IES prepayment customers. There is

no visibility of the energy insecurity experienced by these households. TCAC predicts that this experience is consistent to the households surveyed on the Town Camps.

The work that TCAC has commenced is important and needs to be expanded to other regional and remote centers with prepayment meters. Whilst the issue of energy insecurity has been the subject of analysis by the NT Utilities Commission (UC) for residential account customers the vulnerability of prepayment customers has been overlooked. Even despite this omission the UC has identified that 3.5% of residential account customers/households are vulnerable to debt related disconnection compared to the national average of 1.1% (Utilities Commission, May 2020)^{xix}. According to the Jacana 2018/19 annual report Jacana serviced 85,572 customers, 3.5% of this figure corresponds to 2,995 account customers. If the 2,374 Jacana prepayment customers were included, then this figure would be dramatically higher. If the 4,815 IES prepayment costumers were also included the figure of households likely to experience energy insecurity would approach 10,184. Homelands outside of the regulated (Jacana) and unregulated (IES) networks also need to be considered.

As outlined above TCAC has been working with Jacana to develop and implement a process where prepayment customers can access data including: (1) kWh Consumption Data; (2) Household Energy Expenditure; and (3) Involuntary Self-Disconnection Data (number and duration). The system now recognises prepayment customers despite the lack of an account and data can now be accessed. The access of data requires consent and knowledge of meter numbers and/or national meter indicators (NMI).

TCAC has already deployed its Senior Aboriginal Researchers to pilot the seeking a consent to access this data as a third-party service provider at one Town Camp with 23 houses. At this site consent was provided by each of 23 head tenants. These consent forms were provided to Jacana and data was provided (by Jacana to TCAC) for each complete quarter since smart prepayment meters were installed at the Town Camp.

At the time the data was for the final quarter of 2018/19 and the first 2 quarters of 2019/20. The quarterly data included: (1) kWh; (2) expenditure; (3) number of involuntary self-disconnections; and (4) duration of involuntary self-disconnections.

This data is provided in the following table and demonstrates that the average house at this Town Camp has an average annual consumption of 8,437 kWh at a cost of \$2,342 and that it will experience 51 involuntary self-disconnections for a duration of 238 hours per annum.

			Household Average			
Town Camp			Consumption		Self-Disconnects	
23 Houses		Average	kWh	\$	#	Hours
2019	Apr-Jun	Actual	1979	\$558	11	67
2019	Jul-Sep	Actual	2444	\$684	11	73
2019	Oct-Dec	Actual	1905	\$514	16	39
2020	Jan-Mar	Projected	2109	\$585	13	60
Total	Apr-Mar	Projected	8437	\$2,342	51	238

This rate of energy consumption is low compared to NT household averages listed as follows: (1) 1 bedroom- 13 kWh per annum; (2) 2 bedroom- 31 kWh; (3) 3 bedroom- 32 kWh; and (4) 4 bedroom- 34 kWh. The rate and duration of involuntary self-disconnections is however concerning and worthy of further investigation and analysis.

Whilst acknowledging that more data is required, TCAC has already taken steps to consider the amelioration of this issue. This has included the establishment of an energy brokerage and sundry account by TCAC for the transfer of funds to the prepayment meters of individuals in financial hardship. Through this mechanism TCAC provided \$19,172 in financial assistance on 143 occasions to vulnerable households in Alice Springs and its Town Camps during the period Friday, 15th May to Thursday, 25th June. This assistance is ongoing.

TCAC has also commenced a dialogue with the Minister, Jacana and Services Australia to establish a mechanism where individuals can establish upfront Income Management/Centrepay Deductions to their prepayment meters in order to reduce the number and duration of self-disconnections. If deductions can be established some comparison can be made between the current context and the future context.

Unfortunately to date no mechanism has been identified for the establishment of a mechanism for these deductions nor is a mechanism that can be used for prepayment meter customers to establish direct debits from their bank account available. At a time when it is advisable for people to self-isolate, prepayment customers require a trip to a retailer to put credit on their prepayment meters. It also needs to be noted that there is no mechanism for Indigenous Essential Services customers to access data. Whilst there is a mechanism to access data from Jacana it does not yield data in a timely manner. It appears that systems for prepayment meters need to be upgraded to enable better outcomes for prepayment customers.

The issue of energy insecurity is systemic in nature. Households without power are forced to live with inadequate housing.

4.5.3. Internal Ambient Temperatures

TCAC initiated the relationship with the CSIRO to consider how Town Camp houses are performing with respect to internal ambient temperatures with an emphasis on periods of extreme heat and cold. TCAC is motivated to understand the impact that these internal ambient temperatures are having on the health of our stakeholders. It is hoped that this feasibility study will generate knowledge that contributes directly to the amelioration and mitigation of these impacts.

The following evidence was provided by TCAC to establish the need for such a project:

The Bureau of Meteorology reports that between July 2018 and May 2019 that Alice Springs has had a total of 129 days over 35 °C and 55 days over 40 °C. This period corresponded with a high volume of feedback to TCAC, Central Australian Affordable Housing Company (CAAHC) and Tangentyere Constructions that Town Camp housing has performed badly with respect to internal temperatures.

CAAHC provides Tenancy Management and Tangentyere Constructions employs Housing Maintenance Officers (HMOs) both as subcontractors to the DLGHCD.

Residents reported the failure of evaporative air-conditioners. It is however likely that the basis for the poor climatic performance of Town Camp (and other remote) housing is more complex than the failure of evaporative air-conditioners. It is likely that evaporative air-conditioners have been functioning but that they are insufficient to cool houses to optimal internal temperatures with such extreme weather conditions prevailing.

The Post Occupancy Evaluation of Alice Springs Town Camp Housing 2008-2011 undertaken by the Centre for Appropriate Technology under the direction of TCAC found that the Strategic Indigenous Housing and Infrastructure Program (SIHIP) guidelines prioritised 4 'Critical Healthy Living Practices', which are also the first 4 HLPs listed in NIHG (Centre for Appropriate Technology, 2013). This means that the remaining HLPs were not prioritised. This has an impact on the adequacy of the dwellings, one that needs to be better understood. The HLP that addresses the issue of internal ambient temperatures; and passive and mechanical heating/cooling was not a priority for SIHIP.

Further evidence for the need for the consideration of climate change and heat mitigation comes from the DLGHCD commissioned Deloitte Report titled 'Living on The Edge: Northern Territory Town Camps Review'. This report does not consider climate change and heat mitigation as part of its assessment of the future housing and infrastructure needs of the Territory's Town Camps. This omission is a significant concern for TCAC and other ACCHOs.

To provide some context the 2004 report, Climate Change in the Northern Territory (Hennessy, 2004) noted that Alice Springs averaged 90 days over 35 °C and 17 days over 40 °C (in 2004). This report predicted that by 2030 these figures would increase to between 96-125 days over 35 °C and to between 21-43 days over 40 °C. The figures for 2018/19 have surpassed these predictions. This has implications for housing and power usage. TCAC is motivated to investigate the interrelated issues of climate change, heat and health impacts. It is hoped that a partnership approach will generate data and strategies for mitigation, adaption and amelioration of heat.

TCAC initiated the relationship with the CSIRO to consider how Town Camp houses are performing with respect to internal ambient temperatures with an emphasis on periods of extreme heat and cold. TCAC is motivated to understand the impact that these internal ambient temperatures are having on the health of our stakeholders. It is hoped that this feasibility study will generate knowledge that contributes directly to the amelioration and mitigation of these impacts.

CSIRO and TCAC have received ethics approval and the consent of the Executive Director of Township Leasing and the CEO of the DLGHCD to install temperature data loggers in the homes of Town Campers that have provided their consent. These data loggers will allow the monitoring of internal ambient temperatures and motion over a 12-month period. This data will be linked to data collected on involuntary self-disconnections (electricity) and the health of the participants (if consent is provided).

TCAC considers that this data will provide evidence to support the anecdotal feedback of residents that these dwellings are not appropriate for extreme heat or periods of extreme cold.

4.5.4. Poverty

TCAC provided a submission to the Senate Finance and Public Administration Committee for the inquiry into the appropriateness and effectiveness of the objectives, design, implementation and evaluation of the Community Development Program. In this submission we identified that research undertaken by the Centre for Aboriginal Economic Policy Research (CAEPR) at the Australian National University (ANU) demonstrated that Aboriginal people living in remote and very remote areas are breached from income support payments at ~56 times the rate of income support recipients in urban areas. During this submission we identified that the primary reason for this level of breaching was related to the significant level of participation required from remote income support recipients in 'Work for the Dole' and other mutual obligation activities. Activity requirements for remote income support recipients are far higher than that of urban job seekers.

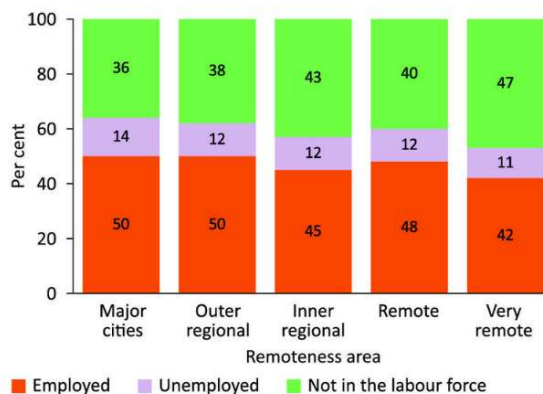
The rates of breaching and the number of people not receiving income support contributes to the low rates of income support and means that the income support safety net is failing. The failure of this safety net impacts significantly on vulnerable households and on those who are homeless. When a recipient's income support payments stop (even temporarily) all Income Management/Centrelink deductions stop. Stopped deductions result in debt including housing debts as rent deductions stop. This system can lead to significant additional financial stress on families who are already struggling financially, compounding other significant stressors they are often facing.

According to the following table only 42% of Aboriginal people aged 15-64 from very remote areas are employed, 11% are unemployed and the remainder are not in the labour force. Tangentyere is concerned that many people designated as 'not in labour force' simply don't receive any income. Once again, these figures and the following table have been outlined in our submission to the Senate Finance and Public Administration Committee for the inquiry into the appropriateness and effectiveness of the objectives, design, implementation and evaluation of the Community Development Program. It is felt that there are multiple determinants impacting upon these figures.

■ Aboriginal and Torres Strait Islander peoples
■ Non-Indigenous Australians

Source: ABS and AIHW analysis of 2012-13 AATSIHS and 2012 SEW

Figure 2.07-3 Labour force status of Indigenous persons aged 15-64 years, by remoteness, 2012-13



5. Mainstream Service Delivery

Since December 2009 the Alice Springs Town Camps have been subjected to the remote public housing framework. This framework is largely consistent with mainstream urban public housing. The 73 NPA Footprint communities are also subjected to the remote public housing framework. Organisations included TCAC, the Land Councils and Aboriginal Housing NT have advocated for the transition from public housing back to community housing under the control of Aboriginal Community Controlled Housing Organisations.

TCAC and its Subsidiary, Tangentyere Constructions and Related Party, Central Australian Affordable Housing Company continue to deliver Housing Related Services under contract from the DLGHCD including the following: (1) Tenancy Management on Town Camps; (2) Property

Management on Town Camps and 11 Remote Communities; (3) Provision of Trade Qualified Repairs and Maintenance Works for the Town Camps and 22 Remote Communities as a Panel Contractor; Tenancy Support Services to Vulnerable Households on the Town Camps and Urban Alice Springs; and Municipal and Essential Services on 7 Town Camps.

The DLGHCD is the landlord, project manager and is responsible for the policy framework. Current housing policy, procedure and practice does not reflect local cultural requirements. Procurement processes are also not ideal impacting on the efficiency and productivity of repairs and maintenance processes. Housing Maintenance Officers can undertake repairs valued at less than \$100. Repairs and maintenance issues assessed to be valued at over \$100 must be escalated to the DLGHCD. The DLGHCD will then generate a work order for one of several panel contractors to undertake the required works.

TCAC has entered into a Local Decision Making (LDM) Agreement with the Northern Territory Government. A key focus of the LDM Agreement is to oversee the transition from a Public Housing Model to a Community Housing Model on the Town Camps. This Community Housing Model is to be delivered by TCAC and partner organisations.

TCAC has identified through Local Decision Making that several steps are required to transition from Public Housing to Community Housing on the Town Camps.

The process requires stabilisation and co-design of Tenancy and Property Management; the consolidation of Property Management with Trade Qualified Repairs and Maintenance; the consolidation of Municipal and Essential Services under one provider; the development and implementation of a Community Housing Model; and the execution of Housing Management Agreement between the Commonwealth and a consortium led by an Aboriginal Community Controlled Organisation, TCAC; a National Regulatory System for Community Housing (NRSCH) Accredited Community Housing Provider (CHP), CAAHC; and a CAL Accredited Aboriginal Construction and Maintenance Company (ACMC), Tangentyere Constructions.

TCAC has been funded to work together with the National Affordable Housing Consortium (NAHC) to develop a Community Housing Model for the Town Camps. The work will be divided between Stage 1, encompassing: Project Planning; Stakeholder Engagement; and Community Housing Model Development; and Stage 2, encompassing Strategic and Investment Planning.

The Community Housing Model will also be informed by partnerships between TCAC and UoN; TCAC and CSIRO; TCAC, CAAHC and Health Habitat; and work being undertaken by TCAC to better understand Energy Security.

A model that is placed based; community controlled; culturally appropriate and delivered by a consortium underpinned professionally accredited and skilled partners will deliver a community housing model that can deliver the best outcomes for our stakeholders. Public housing has not delivered sustainable outcomes for residents of the NPA Footprint. Public housing has undermined self-determination and community control.

6. Governance and Funding Arrangements

TCAC has some reservations about the governance and funding arrangements as outlined by the National Partnership Agreement for Remote Housing NT.

The National Partnership Agreement for Remote Housing NT (NPA) was executed between the Commonwealth and Northern Territory. It also includes the 4 Land Councils as parties to this agreement. The Alice Springs Town Camps represent 5% of the NPA Footprint in terms of the

housing stock. Despite being the representative body for the Alice Springs Town Camps, TCAC is not a party to the NPA. This is regrettable.

There are other issues with the NPA that need to be addressed including the lack of clarity around the outcomes, outputs and expenditure.

The outcomes of the NPA are listed as follows: (a) reducing overcrowding; (b) ensuring a role for the Land Councils in this agreement's governance; (c) providing transparency about how money is spent; and (d) ensuring, to the maximum extent possible, works are delivered by local Indigenous Territorians and businesses.

The outputs of the NPA include the following: (a) construction of additional and replacement houses and extensions informed by Local Decision Making to reduce overcrowding including via improving housing quality – with a minimum total output of 1950 bedrooms providing an equivalent impact of 650 three bedroom houses; (b) implementation of an agreed employment and procurement framework to maximise local Aboriginal jobs and business outcomes; and (c) implementation of an agreed reporting framework for all investment and outcomes.

The NPA is worth \$1,100,000,000 over 5 years but only commits to the construction of the equivalent of 650, 3-bedroom houses. The agreement also commits the Commonwealth Government to the payment of \$35,000,000 to the NT Government for the delivery of property and tenancy management services. Given that it does not cost \$1,638,462 to construct a 3-bedroom dwelling or \$1,065,000,000 to construct 650, 3-bedroom dwellings it would be good to understand why the NPA has set the target as the equivalent of 650, 3-bedroom houses. Alternatively, it would be ideal if the NPA provided more transparency with respect to the proposed expenditure.

The NPA provides commitments to work toward Local Decision Making which is appreciated. The NPA also documents an undertaking to work toward the NIHG and the Building Code 2016. It is noted that the NPA makes no commitment to work toward the National Construction Code (NCC) 2019; Australian Standard for Adaptable Housing; or The Livable Housing Guide. The NPA makes no commitments to improve the amenity of the broader built environment including with respect to Crime Prevention Through Environmental Design; Environmental Health and Council Subdivision Guidelines (where they exist).

7. Recommendations

To address the issue of homelessness and housing vulnerability TCAC makes the following recommendations:

- That the DLGHCD implement the affordable dwelling-based rent model developed as part of the Remote Public Housing Rent Review Project.
- That the DLGHCD recognise the distinction between tenants and other legitimate household members. This step will ensure better occupancy information and will improve census data.
- That the Commonwealth Government increase the rate of income support payments by a base rate of \$75 per week as a universal first step.
- That all public housing become subject to the National Indigenous Housing Guide and the National Construction Code 2019 regardless of remoteness.
- That all public housing be inspected to ensure building compliance on a cyclical basis.
- That the issue of energy insecurity for vulnerable account and prepayment customers be referred for Senate and/or House of Representatives Inquiry.
- That the NT Government invest in Jacana and PowerWater subsidiary Indigenous Essential Services to ensure that customers have improved payment options and access to data.
- That photovoltaic systems be installed to support vulnerable public housing tenants and households.
- That upgrades be made to ensure that household passive and mechanical cooling/heating is appropriate to maintain optimal internal ambient temperatures for good health.
- That jobseeker breaching processes avoid financial penalties that impact upon housing and essential services.
- That targets for increasing housing stock be significantly increased to tackle the issue of homelessness and overcrowding.
- That mainstream public housing be transitioned to community housing providers with emphasis on Aboriginal Community Controlled Housing Organisations.

Appendix 1: NPA Footprint Houses and Energy Provider

Locality	Alias	Combined Name	NPA	Provider	Houses
Acacia Larrakia		Acacia Larrakia	Yes	IES	14
Akngwertnarre	Morris Soak	Morris Soak	Yes	Jacana	15
Ali Curung		Ali Curung	Yes	IES	73
Alpurrurulam		Alpurrurulam	Yes	IES	75
Amanbidji		Amanbidji	Yes	IES	23
Amoonguna		Amoonguna	Yes	IES	60
Ampilatwatja		Ampilatwatja	Yes	IES	46
Angurugu	Anindilyakwa	Anindilyakwa	Yes	IES	158
Anthelk-Ewlpaye	Charles Creek	Charles Creek	Yes	Jacana	16
Anthelk-Ewlpaye	Kunoth	Kunoth	Yes	Jacana	4
Anthepe	Drive In	Drive In	Yes	Jacana	15
Apatula	Finke	Finke	Yes	IES	41
Aper-Alwerkngge	Palmers	Palmers	Yes	Jacana	7
Areyonga		Areyonga	Yes	IES	32
Atitjere	Harts Range	Harts Range	Yes	IES	24
Barunga		Barunga	Yes	IES	72
Belyuen		Belyuen	Yes	IES	43
Beswick		Beswick	Yes	IES	71
Binjarri		Binjarri	Yes	IES	36
Bulla		Bulla	Yes	IES	25
Bulman		Bulman	Yes	IES	24
Canteen Creek		Canteen Creek	Yes	IES	26
Daguragu		Daguragu	Yes	IES	42
Engawala		Engawala	Yes	IES	23
Epenarra	Wutunugurra	Wutunugurra	Yes	IES	31
Ewyenper-Atwatye	Hidden Valley	Hidden Valley	Yes	Jacana	47
Galiwinku		Galiwinku	Yes	IES	234
Gapuwiyak		Gapuwiyak	Yes	IES	112
Gunbalanya	Oenpelli	Oenpelli	Yes	IES	177
Gunyangara	Marngarr	Marngarr	Yes	IES	31
Haasts Bluff	Ikuntji	Ikuntji	Yes	IES	16

Appendix 1: NPA Footprint Houses and Energy Provider (Page 2)

Locality	Alias	Combined Name	NPA	Provider	Houses
Hermannsburg	Ntaria	Ntaria	Yes	IES	98
Ilparpa	New Ilparpa	New Ilparpa	Yes	Jacana	13
Ilperle Tyathe	Warlpiri	Warlpiri	Yes	Jacana	9
Ilpeye-Ilpeye	Golders	Golders	Yes	Jacana	15
Ilyperenye	Old Timers	Old Timers	Yes	Jacana	10
Imangara	Murray Downs	Murray Downs	Yes	IES	18
Imanpa		Imanpa	Yes	IES	24
Inarlenge	Little Sisters	Little Sisters	Yes	Jacana	22
Itwiythwenge	Bassos	Bassos	Yes	Jacana	2
Jilkminggan		Jilkminggan	Yes	IES	37
Kalkarindji		Kalkarindji	Yes	IES	59
Kaltukatjara	Docker River	Docker River	Yes	IES	46
Karnte		Karnte	Yes	Jacana	19
Kintore	Walungurru	Walungurru	Yes	IES	60
Kybrook Farm		Kybrook Farm	Yes	IES	13
Lajamanu		Lajamanu	Yes	IES	102
Laramba		Laramba	Yes	IES	40
Lhenpe Artnwe	Hoppys	Hoppys	Yes	Jacana	14
Maningrida		Maningrida	Yes	IES	277
Manyallaluk	Eva Valley	Eva Valley	Yes	IES	17
Milikapiti	Snake Bay	Snake Bay	Yes	IES	99
Milingimbi		Milingimbi	Yes	IES	116
Milyakburra	Anindilyakwa	Anindilyakwa	Yes	IES	34
Minjilang		Minjilang	Yes	IES	40
Minyerri		Minyerri	Yes	IES	55
Mount Liebig	Watiyawanu	Watiyawanu	Yes	IES	26
Mount Nancy		Mount Nancy	Yes	Jacana	11
Mpwetyerre	Abbotts	Abbotts	Yes	Jacana	6
Mutitjulu		Mutitjulu	Yes	IES	38
Naiyu	Daly River	Daly River	Yes	IES	68
Nganmarriyanga	Palumpa	Palumpa	Yes	IES	50

Appendix 1: NPA Footprint Houses and Energy Provider (Page 3)

Locality	Alias	Combined Name	NPA	Provider	Houses
Ngukurr		Ngukurr	Yes	IES	134
Nturiya		Nturiya	Yes	IES	23
Numbulwar		Numbulwar	Yes	IES	122
Nyewente	Trucking Yards	Trucking Yards	Yes	Jacana	26
Nyirripi		Nyirripi	Yes	IES	43
Papunya		Papunya	Yes	IES	48
Peppimenarti		Peppimenarti	Yes	IES	32
Pigeonhole		Pigeonhole	Yes	IES	23
Pirlangimpi	Garden Point	Garden Point	Yes	IES	90
Pmara Jutunta		Pmara Jutunta	Yes	IES	35
Ramingining		Ramingining	Yes	IES	95
Rittarangu	Urapunga	Urapunga	Yes	IES	16
Robinson River		Robinson River	Yes	IES	38
Santa Teresa	Ltyentye Apurte	Ltyentye Apurte	Yes	IES	99
Tara		Tara	Yes	IES	19
Titjikala		Titjikala	Yes	IES	39
Umbakumba	Anindilyakwa	Anindilyakwa	Yes	IES	74
Wadeye		Wadeye	Yes	IES	277
Wallace Rockhole		Wallace Rockhole	Yes	IES	31
Warruwi		Warruwi	Yes	IES	67
Weemol		Weemol	Yes	IES	15
Willowra		Willowra	Yes	IES	41
Wilora		Wilora	Yes	IES	25
Wurrumiyanga	Nguiu	Nguiu	Yes	IES	306
Yarralin		Yarralin	Yes	IES	45
Yarrenyty Arltere	Larapinta Valley	Larapinta Valley	Yes	Jacana	34
Yirrkala		Yirrkala	Yes	IES	95
Yuelamu		Yuelamu	Yes	IES	37
Yuendumu		Yuendumu	Yes	IES	119
Total					5099

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