



**Danila Dilba**  
Health Service

**Aboriginal Peak Organisations  
Northern Territory**  
An alliance of the CLC, NLC, CAALAS, NAAJA and AMSANT



**Human Rights  
Law Centre**

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Royal Commission into the Protection and  
Detention of Children in the Northern Territory

Joint Submission of the Aboriginal Peak Organisations Northern  
Territory, Danila Dilba Health Service and Human Rights Law  
Centre

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4 November 2016

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## About the Aboriginal Peak Organisations Northern Territory

The Aboriginal Peak Organisations Northern Territory (APO NT) is an alliance comprising the Central Land Council (CLC), Northern Land Council (NLC), North Australian Aboriginal Justice Agency (NAAJA), Central Australian Aboriginal Legal Aid Service (CAALAS) and the Aboriginal Medical Services Alliance of the NT (AMSANT).

The alliance was established in October 2010 in response to a longstanding need in the NT for effective collaboration amongst Aboriginal organisations on issues affecting Aboriginal communities. APO NT was created to provide a more effective response to key issues of joint interest and concern affecting Aboriginal people in the Northern Territory, including through advocating practical policy solutions to government. APO NT is leading the movement to change.

## About Danila Dilba Health Service

Danila Dilba Health Service is an Aboriginal community-controlled organisation providing culturally-appropriate, comprehensive primary health care and community services to Biluru (Aboriginal and Torres Strait Islander) people in the Yilli Rreung (greater Darwin) region of the Northern Territory.

Danila Dilba's mission is to improve the physical, mental, spiritual, cultural and social well-being of the Biluru community of the Yilli Rreung Region through innovative comprehensive primary health care programs, community services and advocacy that are based on the principles of equity, access, empowerment, community self-determination and collaboration.

## About the Human Rights Law Centre

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## Endorsements

The following organisations also contributed to, and endorse this submission:

- Children in Care and Youth Detention Advice Service
- NT Shelter

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## Housing and children's vulnerability to entering the child protection and youth detention systems

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### Purpose of submission

1. Term of reference (h) asks the Royal Commission to look at improvements to the child protection system, including identification of early intervention options. The purpose of this submission is limited to highlighting the importance of the Royal Commission considering the high rates of overcrowding, homelessness and inadequate housing experienced by Aboriginal people as a foundational aspect of effective prevention and early intervention, both in terms of children entering the child protection system and the youth justice system.
2. This submission acknowledges, but does not explore, the complex interrelationships between adequate housing and other common individual, family, social and environmental risk factors for child abuse and neglect.<sup>1</sup> We also note that children who have experienced abuse and neglect are more likely to engage in criminal activity and enter the youth justice system.<sup>2</sup>
3. The Royal Commission has heard from Ms Muriel Bamblett, one of the authors of *Growing Them Strong, Together*, who described housing as a top priority for reducing the number of Aboriginal children entering the Northern Territory child protection system.<sup>3</sup> Ms Bamblett pertinently observed that 'everything has its basis in having a home and being able to nurture and look after children'.<sup>4</sup>
4. The Northern Territory has by far the highest rates of homelessness and overcrowding in Australia – 731 people per 10,000 people in the 2011 Census compared to a national average of 49 per 10,000.<sup>5</sup> The disproportionate burden of homelessness and overcrowding borne by Aboriginal people, as set out in paragraph 14 of this submission, mirrors the disproportionately high rates at which Aboriginal children enter the child protection and youth detention systems in the Northern Territory. Homelessness, overcrowding and poor housing conditions are relevant both to the rate at which children enter the child protection system and their prospects for successful family reunification.

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<sup>1</sup> Australian Institute of Family Studies, *Risk and Protective Factors for Child Abuse and Neglect* (CFCA Resource Sheet, March 2013) <<https://aifs.gov.au/cfca/publications/risk-and-protective-factors-child-abuse-and-neglect>>.

<sup>2</sup> Australian Institute of Health and Welfare, *Young People in Child Protection and Under Youth Justice Supervision 2014-15* (Data Linkage Series No 22, 2016).

<sup>3</sup> Royal Commission into the Protection and Detention of Children in the Northern Territory, Transcript, 13 October 2016, 205.

<sup>4</sup> *Ibid.*

<sup>5</sup> Australian Bureau of Statistics, 2049.0 – Census Population of Housing: Estimating Homelessness (12 November 2012) <<http://abs.gov.au/ausstats/>>. This rate has declined since 2001 but is still substantially higher than any other jurisdiction.

5. Accordingly, we recommend the Royal Commission investigate the impact of overcrowding, homelessness, inadequate housing and public housing management in the Northern Territory on the rates of Aboriginal children entering the child protection system and youth justice system. We also recommend the Royal Commission consider the impact of these factors as a barrier to family re-unification. Failure to consider overcrowding, homelessness and inadequate housing as causal factors risks undermining the effectiveness and implementation of other recommendations made by the Royal Commission.
6. At the conclusion of this submission we include some recommendations as to ways the Royal Commission can further explore this issue.

## Adequate housing as a determinant of health and wellbeing

7. Adequate housing has long been recognised as a basic human need and as one of many interrelated factors impacting on child health, development and wellbeing.<sup>6</sup> Access to stable and adequate housing 'enables adults and children to engage in the wider community – socially, recreationally and economically, and can influence both their physical and mental health'.<sup>7</sup>
8. The conditions and stability of housing, or lack thereof, can affect the physical and emotional safety of a child's environment, as can exposure to violence and abuse, and lead to poorer outcomes.<sup>8</sup> The Australian Institute of Health and Welfare has observed that high housing costs, housing mobility, overcrowding and homelessness all affect child development, health and wellbeing.<sup>9</sup> Furthermore:

the adverse effects of overcrowding and homelessness on children can persist throughout life, ultimately affecting future socioeconomic status and adult wellbeing; children are also at a greater risk of finding themselves in similar situations as their parents, leading to the intergenerational transmission of social inequality.<sup>10</sup>
9. *The Growing Them Strong, Together* report emphasised that improvement in living conditions was fundamental to improving child safety and wellbeing in the Territory. The report observed that:

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<sup>6</sup> See eg United Nations Committee on Economic, Social and Cultural Rights, *General Comment No 14: The Right to the Highest Attainable Standard of Health (Art 12 of the Covenant)* E/C.12/2000/4, 11 August 2000, [4], [11]; Vicki-Ann Ware, 'Housing Strategies that Improve Indigenous Health Outcomes' (Resource Sheet No 25, Australian Institute of Health and Welfare, 2013).

<sup>7</sup> Australian Institute of Health and Welfare, *Headline Indicators for Children's Health, Development and Wellbeing 2011* (2011) 90.

<sup>8</sup> *Ibid* 3.

<sup>9</sup> *Ibid* 90. On mobility, see Catherine Holmes and Eva McRae-Williams, *An Investigation into the Influx of Indigenous 'Visitors' to Darwin's Long Grass from Remote NT Communities – Phase 2* (Monograph Series No 33, National Drug Law Enforcement Research Fund, 2008); Office of the Coordinator-General for Remote Services, *Office of the Coordinator-General for Remote Services Report: June 2011 to August 2012* (2012).

<sup>10</sup> *Ibid* (citing Claudia Solari and Robert Mare, 'The Effects of Crowded Housing on Children's Wellbeing' Paper presented at the annual meeting of the American Sociological Association, 11 August 2007).

- (a) Many Aboriginal families in remote communities lack adequate access to the social determinants that promote health and wellbeing, including adequate housing, nutrition, education and safety.<sup>11</sup>
  - (b) Chronic housing shortage reduces the number of Aboriginal carers who can take children in - families may want to care for a child but cannot because of their housing situation.<sup>12</sup>
  - (c) The most frequently substantiated ground that leads to an Aboriginal child entering the child protection system is neglect – the failure by a parent or guardian to provide for a child’s basic needs, including shelter, food, healthcare, hygiene and supervision.<sup>13</sup>
  - (d) The disproportionately high rates at which Aboriginal children are removed from their families because of neglect, compared to non-Aboriginal children, ‘is consistent with the disadvantaged socio-economic conditions prevalent in many Aboriginal communities, such as overcrowding, unemployment and a lack of services’.<sup>14</sup>
  - (e) Improving living conditions and ensuring that children and families can access the social determinants that promote health is essential to reducing the rates of children going into care.<sup>15</sup>
10. Aboriginal children are at a heightened risk of complex trauma and the relationship between this and housing is important to understand. Complex trauma underlies complex health, social and emotional issues, which lead to the involvement of child protection and youth justice services.<sup>16</sup> The Western Australian Aboriginal Child Health Survey identified that economic deprivation (poverty, substandard or lack of housing, exposure to racism, discrimination and social marginalisation and exclusion), were among the factors that increased the risk of childhood trauma.<sup>17</sup>

## The human right to adequate housing

11. The right to an adequate standard of living, including adequate housing, is articulated in the *International Covenant on Economic, Social and Cultural Rights (ICESCR)*.<sup>18</sup> ICESCR makes

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<sup>11</sup> Muriel Bamblett et al, *Growing Them Strong, Together: Promoting the Safety and Wellbeing of the Northern Territory’s Children* (Report of the Board of Inquiry into the Child Protection System in the Northern Territory, 2010) 20.

<sup>12</sup> Ibid 132.

<sup>13</sup> Ibid 166.

<sup>14</sup> Ibid.

<sup>15</sup> Ibid 112.

<sup>16</sup> N Ralph et al, ‘Transgenerational trauma, suicide and healing from sexual abuse in the Kimberley region, Australia’ (2006) 4(2) *Pimatisiwin; A Journal of Aboriginal and Indigenous Community Health*, 118–36.

<sup>17</sup> SR Silburn et al, *The Western Australian Aboriginal Child Health Survey: Strengthening the Capacity of Aboriginal Children, Families and Communities* (Curtin University of Technology and Telethon Institute for Child Health Research, 2006); JA De Maio et al, *The Western Australian Aboriginal Child Health Survey: Measuring the Social and Emotional Wellbeing of Aboriginal Children and Intergenerational Effects of Forced Separation* (Curtin University of Technology and Telethon Institute for Child Health Research, 2006).

<sup>18</sup> United Nations General Assembly, *International Covenant on Economic, Social and Cultural Rights* (opened for signature 16 December 1966, entered into force 3 January 1976), art 11.

clear that housing should be physically and culturally adequate, secure, affordable, accessible and habitable.<sup>19</sup> Occupants should have a degree of security of tenure, adequate privacy, security and space, and access to basic necessities, such as safe drinking water, sanitation and washing facilities, food storage and cooking facilities.

12. Governments have an immediate obligation to ensure that the right to housing can be realised without discrimination.<sup>20</sup> Both the United Nations Special Rapporteur on adequate housing and the Special Rapporteur on the rights of Indigenous peoples have observed the disparity and discrimination between Indigenous and non-Indigenous Australians in terms of access to adequate housing.<sup>21</sup>

## The state of housing in the Northern Territory

13. Nearly 30 per cent of people in the Northern Territory are Indigenous, 80 per cent of whom live in remote or very remote locations.<sup>22</sup> As noted above, the Northern Territory has by far the highest rates of homelessness and overcrowding in Australia. The impact of this is overwhelmingly borne by Aboriginal people living in remote communities.
14. The Australian Bureau of Statistics definition of homelessness captures those living in an inadequate dwelling and those living in severely crowded houses (dwellings requiring four or more additional bedrooms).<sup>23</sup> According to 2011 Census data, 85 per cent of homeless people in the Northern Territory were in severely crowded dwellings, 91 per cent of those dwellings were in very remote locations and 98 per cent of those living in severely overcrowded houses were Indigenous.<sup>24</sup> This level of overcrowding in remote communities places severe pressure on electricity, sewage and water infrastructure, which in some places cannot keep up with demand.
15. A lack of housing and supported accommodation, together with other factors, such as unemployment, alcohol misuse, family violence and lack of access to health and other

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<sup>19</sup> United Nations Committee on Economic, Social and Cultural Rights, *General Comment 4: The Right to Adequate Housing (Art 11(1) of the Covenant)*, 1 January 1992.

<sup>20</sup> United Nations General Assembly, *International Covenant on Economic, Social and Cultural Rights*, (entered into force 3 January 1976), art 2.2; United Nations General Assembly, *Convention on the Elimination of all Forms of Racial Discrimination* (entered into force 4 January 1969), art 5(e)(iii). Article 21 of the United Nations *Declaration on the Rights of Indigenous Peoples* states that Indigenous peoples have a right to improvement in their economic and social conditions, including housing.

<sup>21</sup> Miloon Kothari, *Report of the Special Rapporteur on the right to housing as a component of the right to an adequate standard of living*, A/HRC/4/18/Add.2 (11 May 2006); James Anaya, *Report by the Special Rapporteur on the situation of human rights and fundamental freedoms on indigenous people*, A/HRC/15/37/Add.4, 1 June 2010.

<sup>22</sup> Australian Bureau of Statistics, 3238.0.55.001 – Estimates of Aboriginal and Torres Strait Islander Australians, June 2011 (30 August 2013), data cubes, <<http://www.abs.gov.au/AUSSTATS/>>.

<sup>23</sup> Australian Bureau of Statistics, 2049.0 – Census Population of Housing: Estimating Homelessness (12 November 2012) <<http://abs.gov.au/ausstats/>>. The ABS uses the Canadian National Occupancy Standard for Housing Appropriateness, which determines household bedroom requirements based on the number of people in a household, and the relationships and ages of all household members. Households that require at least one additional bedroom are considered to experience some degree of overcrowding.

<sup>24</sup> *Ibid*, data cubes. See commentary by Chris Chamberlain, 'Homelessness: Reshaping the Policy Agenda' (Australian Housing and Urban Research Institute, 2014).

- services, results in some families leaving communities for urban centres.<sup>25</sup> However in urban centres, there are long waits for public housing, very few affordable housing options, a lack of transitional or supported accommodation and fluctuating levels of assistance with return travel.<sup>26</sup>
16. This can result in people becoming homeless in urban centres, and being taken in by family members, which in turn places pressure on urban public housing tenancies and Town Camp residents. The extent and impact of these patterns of mobility are insufficiently understood, including as they relate to children. The Office of the Northern Territory Coordinator-General of Remote Services recommended in 2012 that a comprehensive study be undertaken on Aboriginal peoples' mobility and migration between communities and urban centres so as to identify current and future service needs.<sup>27</sup>
  17. As has been noted by the North Australian Aboriginal Justice Agency (**NAAJA**) in an Issues Paper provided to the Department of Housing in 2016, while overcrowding is primarily driven by a historical shortage of housing in the Northern Territory, strong kinship obligations also contribute.<sup>28</sup> That is, overcrowded Aboriginal households often take in homeless family members, and in doing so, perform a broader public service. This can blur the lines between overcrowding and homelessness and conceal the real number of those experiencing homelessness.<sup>29</sup>
  18. In 2007, the *Little Children are Sacred* report described the lack of adequate housing for Aboriginal people in the Northern Territory as 'nothing short of disastrous and desperate'.<sup>30</sup> Overcrowding was said to have a direct impact on family and sexual violence, substance abuse, chronic illness and poor educational and employment outcomes – all causal factors for young people entering both the child protection and youth detention systems. Overcrowding also puts pressure on housing infrastructure, and contributes to poor housing conditions that can adversely impact on child health and wellbeing.
  19. The *Little Children are Sacred* report estimated that some 4000 additional houses were needed to adequately house the Northern Territory's population. At least a further 400 houses

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<sup>25</sup> See discussion in Catherine Holmes and Eva McRae-Williams, *An Investigation into the Influx of Indigenous 'Visitors' to Darwin's Long Grass from Remote NT Communities – Phase 2* (Monograph Series No 33, National Drug Law Enforcement Research Fund, 2008) 7.

<sup>26</sup> The exorbitant cost of air travel to remote areas, prolongs the stay of visitors in town centres. For example, in the Top End, a return airfare for one adult to Ramingining exceeds \$1,000. For parents travelling with children, this amount is excessive and highly disproportionate to those on low incomes.

<sup>27</sup> Office of the Coordinator-General for Remote Services, *Office of the Coordinator-General for Remote Services Report: June 2011 to August 2012* (2012) 32. See also Catherine Holmes and Eva McRae-Williams, *An Investigation into the Influx of Indigenous 'Visitors' to Darwin's Long Grass from Remote NT Communities – Phase 2* (Monograph Series No 33, National Drug Law Enforcement Research Fund, 2008).

<sup>28</sup> North Australian Aboriginal Justice Agency, *Northern Territory Housing Issues Paper and Response to the Housing Strategy Consultation Draft* (February 2016) 7 (accessible at <http://www.naaja.org.au>).

<sup>29</sup> *Ibid.* See also Christina Birdsall-Jones et al, *Indigenous Homelessness: Final Report* (Australian Housing and Urban Research Institute, 2010) 9.

<sup>30</sup> Rex Wild and Patricia Anderson, *Ampe Akelyememane Meke Mekarle – Little Children Are Sacred* (Report of the Northern Territory Board of Inquiry into the Protection of Aboriginal Children from Sexual Abuse, 2007) 195.



- would need to be built each year for 20 years to keep up with population growth.<sup>31</sup> In 2008, it was estimated by the Centre for Aboriginal Economic Policy Research that 7827 more houses were needed to meet the needs of Aboriginal people across the Territory.<sup>32</sup>
20. Safe and appropriate housing was identified as foundational to the Closing the Gap targets agreed to by the Council of Australian Governments. 1456 new houses and 2915 rebuilds and refurbishments were planned for remote Northern Territory communities by 2018 under the National Partnership Agreement on Remote Indigenous Housing (**NPARIH**).<sup>33</sup> The National Partnership on Remote Housing (**NPRH**) replaced NPARIH from 1 July 2016. The Department of Housing advised that as at 31 July 2016, 1191 new houses had been built and 2929 houses rebuilt or refurbished under NPARIH and NPRH.<sup>34</sup> A further 1028 upgrades were completed under Stronger Futures and the Remote Australia Strategies Programme.<sup>35</sup> This significant investment addresses some of the housing needs in remote communities, but only a fraction of the need for additional housing identified by the above reports.
21. Data from the 2014-15 National Aboriginal and Torres Strait Islander Social Survey indicates that in the Northern Territory, 31.1 per cent of all Aboriginal households (remote, regional and urban) require at least one additional bedroom. While this represents a continuing decline compared to past years,<sup>36</sup> it is nearly three-times the rate of Queensland, the next highest jurisdiction, and compares to 6.8 per cent of non-Indigenous households in the Territory.<sup>37</sup>
22. In addition, we note that homelessness is not just a function of scarcity of houses. Alcohol and drug abuse, domestic violence, a shortage of affordable housing, mental illness, family breakdown and unemployment, are all contributing factors.<sup>38</sup>
23. NAAJA's 2016 Issues Paper documented instances where the Department of Housing's response to such issues was unnecessarily punitive and placed families with children at risk of eviction into homelessness.<sup>39</sup> Policies such as the Department's new Red Card Policy and the former Three Strikes Policy for dealing with alleged 'anti-social behaviour', can penalise tenants for health issues or protective responses, while at the same time failing to accommodate cultural interests and obligations or acknowledge the impacts of intergenerational trauma on Aboriginal people's day-to-day lives. In this way, the Department's

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<sup>31</sup> Ibid.

<sup>32</sup> Nicholas Biddle, 'The Scale and Composition of Indigenous Housing Need, 2001-06' (Working Paper No 47, Centre for Aboriginal Economic Policy Research, 2008) 15.

<sup>33</sup> Hal Bisset, *Aboriginal Remote Housing Forum* (NT Shelter, Central Australian Affordable Housing Company, Aboriginal Peak Organisations Northern Territory, 2015) 11 (<[www.amsant.org.au](http://www.amsant.org.au)>).

<sup>34</sup> Email from Department of Housing to the Aboriginal Peak Organisations Northern Territory, 3 November 2016.

<sup>35</sup> Ibid.

<sup>36</sup> See eg Australian Institute of Health and Welfare, *Housing Circumstances of Indigenous Households: Tenure and Overcrowding* (2014) 21.

<sup>37</sup> Australian Bureau of Statistics, 4714.0 – National Aboriginal and Torres Strait Islander Social Survey 2014-2015 (2016), Table 24.3, <<http://www.abs.gov.au/AUSSTATS/>>.

<sup>38</sup> Department of Families, Housing, Community Services and Indigenous Affairs, *The Road Home. A National Approach to Reducing Homelessness* (Australian Government, 2008).

<sup>39</sup> North Australian Aboriginal Justice Agency, *Northern Territory Housing Issues Paper and Response to the Housing Strategy Consultation Draft* (February 2016).

urban tenancy management practices may be viewed as inconsistent with preventing homelessness, family stress and intervention by child protection.

## Evidence and directions for reform

24. The recommendations below are not intended to be exhaustive. We would be pleased to provide more detailed submissions or be of assistance in any other way the Royal Commission requires.
25. Health Habitat is an organisation that frames the design and repair of houses around the need to provide a healthy and safe environment for occupants. It has successfully worked in collaboration with Aboriginal communities over many years. It also developed, coordinated and funded *Housing for Health – The Guide*.<sup>40</sup> We recommend that the Royal Commission hear evidence from Health Habitat in relation to its Housing for Health framework.
26. We recommend that the Royal Commission receive evidence from the Departments of Housing and Territory Families in relation to strategies to prioritise, improve and promote access to adequate housing as a social determinant of health for Aboriginal people, including:
  - (a) adopting homelessness prevention strategies in its management of public housing;
  - (b) measures to increase and improve the availability of remote, regional and urban housing and to address barriers to housing for families with children;
  - (c) measures to respond to families at risk of having a child taken into care where inadequate housing forms part of the risk;
  - (d) strategies to identify the extent and impact of mobility between remote communities and urban centres and the need for transitional and supported accommodation options in remote, regional and urban contexts;
  - (e) strategies for working in partnership with Aboriginal agencies and peak bodies, including Aboriginal Housing NT, consistent with Article 23 of the United Nations *Declaration on the Rights of Indigenous Peoples*.
27. We recommend that the Royal Commission receive evidence from the Departments of Housing and Territory Families regarding whole of government approaches to eliminating barriers to accessing public housing where there is an identified child protection or youth detention risk.
28. We recommend that the Royal Commission enquire into whether the Department of Territory Families collects data for each substantiated child protection report on:
  - (a) the child's living circumstances, including whether the child is housed, homeless, lives in overcrowded conditions or temporary housing;

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<sup>40</sup> See Health Habitat, <http://www.healthhabitat.com/about>; *Housing for Health – The Guide*, <http://www.housingforhealth.com/>

- (b) where the child is housed, the number of bedrooms, bathrooms and toilets in that house;
  - (c) the number of people living in the house or using the facilities of that house, for example people in tents or living on verandahs; and
  - (d) the condition of the house.
29. We also recommend that the Royal Commission enquire into whether the Department of Corrections collects data for each child that enters a youth detention facility about the matters set out at paragraph 28(a)-(d).
30. This data is critical to understanding the role of overcrowding, homelessness and inadequate housing in the over-representation of Aboriginal children in the child protection and youth justice systems.
31. We recommended the following reports be reviewed by the Royal Commission in relation to the impact of housing conditions on children's health, development and wellbeing:
- (a) Australian Institute of Health and Welfare, 'Shelter: Development of a Children's Headline Indicator' (Information Paper, 2010).
  - (b) Australian Institute of Health and Welfare, Children and Young People at Risk of Social Exclusion: Links between Homelessness, Child Protection and Juvenile Justice (Data Linkage Series No 13, 2012).
  - (c) Ross Bailie et al, 'Skin Infection, Housing and Social Circumstances in Children Living in Remote Indigenous Communities: Testing Conceptual and Methodological Approaches' (2005) 5 *BMC Public Health* 128.
  - (d) Christina Birdsall-Jones et al, *Indigenous Homelessness: Final Report* (Australian Housing and Urban Research Institute, 2010)
  - (e) Hal Bisset, *Aboriginal Remote Housing Forum* (NT Shelter, Central Australian Affordable Housing Company, Aboriginal Peak Organisations Northern Territory, 2015), <[www.amsant.org.au](http://www.amsant.org.au)>.
  - (f) Chris Chamberlain, *Homelessness: Reshaping the Policy Agenda* (Australian Housing and Urban Research Institute, 2014)
  - (g) Alfred Michael Dockery et al, 'Housing and Children's Development and Wellbeing: A Scoping Study' (2010, Australian Housing and Urban Research Institute).
  - (h) Alfred Michael Dockery et al, 'Housing and Children's Development and Wellbeing: Evidence from Australian Data' (2013, Australian Housing and Urban Research Institute).
  - (i) Paul Flatau et al, 'Lifetime and Intergenerational Experiences of Homelessness in Australia' (2013, Australian Housing and Urban Research Institute).

- (j) Health Habitat, *Housing for Health: The Guide*, <http://www.housingforhealth.com/>.
- (k) Catherine Holmes and Eva McRae-Williams, *An Investigation into the Influx of Indigenous 'Visitors' to Darwin's Long Grass from Remote NT Communities – Phase 2* (Monograph Series No 33, National Drug Law Enforcement Research Fund, 2008).
- (l) North Australian Aboriginal Justice Agency, *Northern Territory Housing Issues Paper and Response to the Housing Strategy Consultation Draft* (February 2016), <http://www.naaja.org.au/>.
- (m) Office of the Coordinator-General for Remote Services, *Office of the Coordinator-General for Remote Services Report: June 2011 to August 2012* (2012).