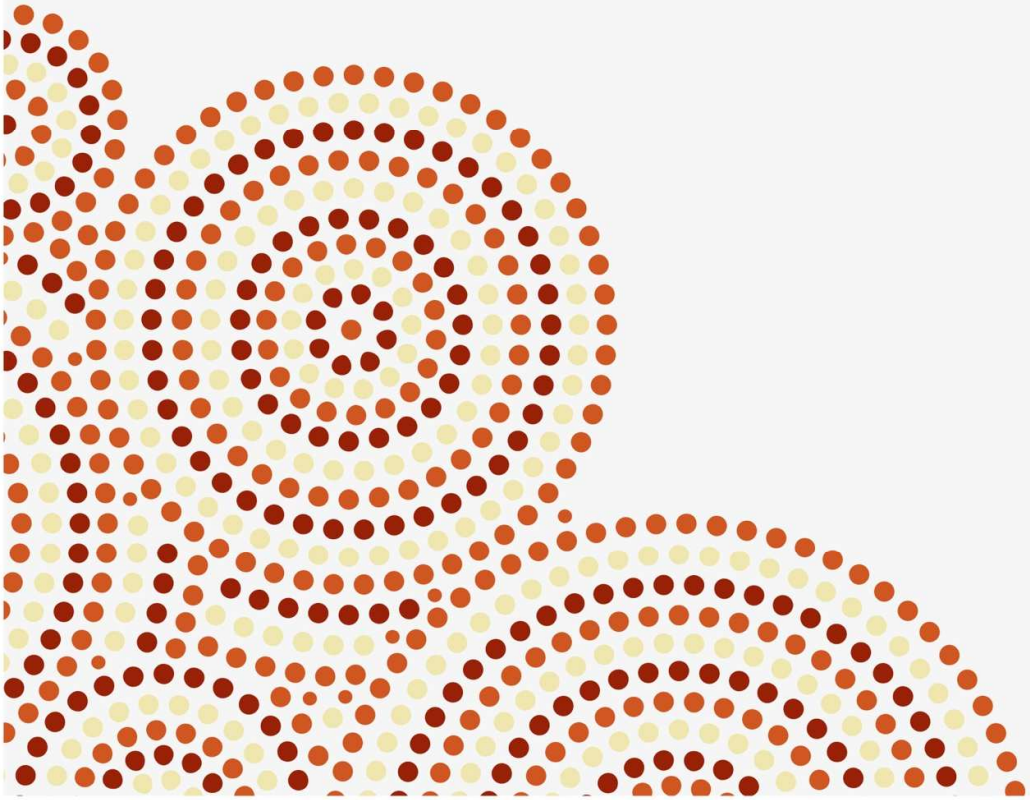
TANGENTYERE
COUNCIL
SUBMISSION

Tangentyere Council

Draft Anti-Discrimination Amendment Bill 2022

Department of Attorney General and Justice



WORKING
TOGETHER
WALKING
TOGETHER

19 August 2022

1. Citation

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Contents

1. Citation 2

2. Summary 3

3. Background 3

4. Protected Attributes 4

5. Geographic Location 4

5.1. Urban Drift 4

5.2. Incentivised Migration 5

5.3. Remote Public Housing 5

5.4. Building Control 6

5.5. Subdivision Guidelines- the Built Environment and Public Infrastructure 8

6. Socio-Economic Status 10

7. Cultural Morning Practices 10

8. Cultural Naming Conventions 10

9. Conclusion 11

10. Appendix 1: NT Town Camps Review: Essential Infrastructure Upgrades 12

11. References 13

2. Summary

Tangentyere Council Aboriginal Corporation (TCAC) welcomes the opportunity to provide a submission to the proposed amendments to the Anti-Discrimination Act 1992 (the Act).

TCAC commends the Territory in its determination and commitment to the modernization of the Act. The amendments proposed in the Anti-Discrimination Bill, 2022 are progress toward the greater protection of residents from discrimination, and in the promotion of equality. The proposed amendments address many shortfalls and gaps to the current legislation.

TCAC acknowledges and supports the importance of the issues covered in the proposed amendments. Our submission will primarily address areas relevant to key areas of relevance to TCAC, Board of Directors and Members. TCAC acknowledges the work of those organizational actors that it has liaised with during the preparation of its own submission including: (1) NTCOSS; (2) NTShelter; and (3) Darwin Community Legal Service.

3. 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 km^2. The TCAC Board of Directors is composed of the elected Presidents of the 11 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.

The 16 Alice Springs Town Camp Associations/Aboriginal Corporations and TCAC were formed by Town Campers to support their efforts to gain access to Land; Housing; Infrastructure; and Municipal and Essential Services. TCAC was incorporated in 1979 as an Aboriginal Community Controlled Housing Organisation (ACCHO).

Between 1979 and December 2009 TCAC was an ACCHO for the Town Camps. Since December 2009 the Territory has been the Housing Authority for the Town Camps. In 2009, 11 Town Camp Associations and 3 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 Housing Management Agreements (Subleases) with the CEO of Housing (NT) making the Department of Territory Families, Housing and Communities (DTFHC) the Housing Authority for the Town Camps. TCAC and its Subsidiary, Tangentyere Constructions and Related Party, Community Housing Central Australia (CHCA) continue to deliver Housing Related Services under contract from the Territory.

TCAC and the Territory executed a Local Decision-Making (LDM) Agreement in July 2020. One key element of the LDM Agreement between TCAC and the Territory is to transition from Public Housing to Community Housing on the Alice Springs Town Camps. The development of a Community Housing Model is on track for this transition to coincide with the expiration of the current Housing Management Agreements between the EDTL and the CEOH.

4. Protected Attributes

TCAC supports the addition of new Protected Attributes as outlined in the Anti-Discrimination Bill, 2022.

The comprehensive definition of Protected Attributes is a priority. TCAC will seek to address some key areas relevant to our members, clients, and program participants. The list of Protected Attributes that follows is not a comprehensive list of attributes but those that TCAC is concerned may not be addressed by other stakeholders.

5. Geographic Location

The recognition of Geographic Location as a Protected Attribute is a priority in the Northern Territory where many disadvantaged people live in geographically remote and very remote locations.

The following subsections highlight issues that demonstrate discrimination based on geographic location. In several cases the discrimination is unintended and in other instances the discrimination is intended.

5.1. Urban Drift

Regional Development Australia (RDA) is a partnership between Australian, Territory, and Local Government to support economic and workforce development. In 2010 the RDA published a Regional Development Plan for the NT. The description of 'Urban Drift' reproduced from the 2010-2012 Regional Development Plan below highlights discrimination against Aboriginal people from remote NT while in urban/regional centres. A word of warning, the quote included in the following text box is highly offensive.

> 'Urban drift is a generic term used to describe situations across the nation whose only similarity is the movement of people from remote to urban communities. In the Territory the position is even more extreme than in most other jurisdictions. We have a unique situation here where most of the movement, although some of it is camouflaged by visiting hospital or prison inmates, is primarily to gain access to grog. Even the Rascals in New Guinea who are a huge criminal element initially came out of the bush seeking work whereas few if any of the vagrants within Territory urban communities have any intention of seeking work. The most extreme symptoms of the problems associated with this drift do of course appear in urban centres where crime and antisocial behaviour are rife. Indeed, in some centres such as Tennant and to a lesser extent Alice Springs and Katherine many see the problem as intractable. It seems that although millions (billions?) of dollars are being thrown at the problem that money and improved access to housing in urban areas will never really provide a solution and this can only be achieved if people either seek work or return to their communities. There will of course be no large-scale return to communities unless alcohol becomes available, and this would need to be done under very controlled circumstances. Although the picture for the urban centres is a very grim one, the position in the home communities themselves is no rosier'[i].

This 2010-12 Regional Development Plan was removed from publication following complaints by TCAC to the Racial Discrimination Commission and the Human Rights Commission. These were made in response to the inflammatory, disrespectful, and inaccurate characterisation of people from remote NT. This type of reflection by the RDA further stigmatises Aboriginal people and questions their right to access major service centres.

These perceptions continue to exist and underpin the perception that urban areas need to be protected from remote visitors. This perception underpins a lack of services including visitor accommodation for visitors from remote communities. This frequently results in individuals/groups needing to camp in public spaces or to stay with family in already overcrowded public housing dwellings (particularly the Town Camps). Ironically the lack of services for remote visitors probably increases any real impacts to the broader community.

This may explain the lack of coordinated responses to mobility between remote and urban/regional NT.

5.2. Incentivised Migration

The Living on the Edge Northern Territory Town Camps Review presented a view on economics and migration that was strongly opposed by many Aboriginal Community Controlled Organisations.

Deloitte recommended 'that investment in additional housing should not be made in the Town Camps'[ii]. Deloitte outlined the need to limit investment to regions offering a 'diversified economic platform' and 'substantial opportunity. This recommendation would exclude expenditure on the Alice Springs Town Camps as although Alice Springs was identified as having 'solid economic fundamentals' it doesn't have the potential for growth according to the reviewer.

Deloitte provided economic advice to the Territory using a traffic light system, with Darwin rated green for having a 'diversified economic platform' with 'substantial opportunity'. Alice Springs, Katherine, and Borroloola were rated amber with 'partially diversified economic platforms' with some opportunities. The remainder of the Northern Territory was rated red due to being 'constrained by limited industries. Deloitte recommended limiting expenditure in housing and infrastructure to regions of 'diversified economic platform' and 'substantial opportunities' as this would allow residents to integrate with the broader economy. Deloitte advised that migration should be incentivised to regions of greater economic opportunity. In short, the Territory was advised to abandon areas outside of Darwin.

Living on the Edge failed to acknowledge or respect the strong connection people have to country.

Living on the Edge was published by the Northern Territory Government. Many recommendations were not accepted. Living on the Edge is however still available on the DTFHC website.

5.3. Remote Public Housing

The timing of our response coincides with the proposed implementation of a remote rent framework by the NT Department of Territory Families, Housing and Communities (DTFHC).

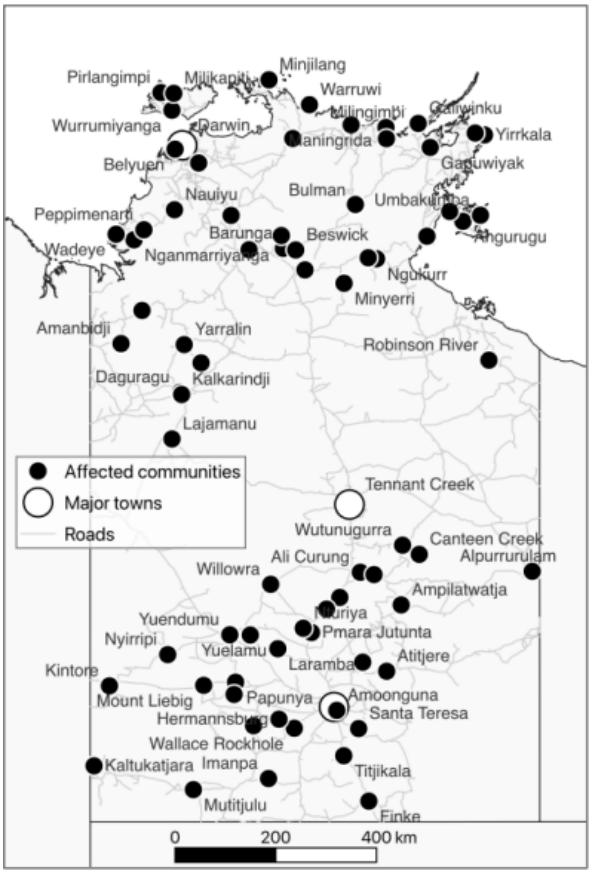
The proposed remote rent framework will make significant changes to remote public housing including the cessation of rebated rent. The cessation of rebated rent will increase rent for 68% of remote households:

Figure 1- Projection of Household Rent Projections[iii]

Region	Change in rents charged			
	Decrease or no increase (n households)	Increase (n households)	Increase (%)	Average increase ($ per household per week)
Arnhem	411	511	55%	$58
Arafura	474	946	67%	$64
Barkly	69	290	81%	$82
Big Rivers	289	520	64%	$62
Central Australia	211	868	80%	$76
Total	1454	3135	68%	$68

The locations subject to the new remote rent framework include the 17 Alice Springs Town Camps, 5 Tennant Creek Community Living Areas and 73 Remote Aboriginal Communities where ~100% of tenants are Aboriginal.

Figure 2- Geographic Locations Subject to Proposed New Remote Rent Framework[iv]



Acacia Larrakia	Haasts Bluff	Nyirripi
Ali Curung	Hermannsburg	Papunya
Alpurrurulam	Imangara	Peppimenarti
Amanbidji	Imanpa	Pigeonhole
Amoonguna	Jilkminggan	Pirlangimpi
Ampilwatja	Kalkarindji	Pmara Jutunta
Angurugu	Kaltukatjara	Ramingining
Apatula	Kintore	Rittarangu
Areyonga	Kybrook Farm	Robinson River
Atitjere	Lajamanu	Santa Teresa
Barunga	Laramba	Tara
Belyuen	Maningrida	Titjikala
Beswick	Manyallaluk	Umbakumba
Binjarri	Milikapiti	Wadeye
Bulla	Milingimbi	Wallace Rockhole
Bulman	Milyakaburra	Warruwi
Weemol	Minjilang	Willowra
Canteen Creek	Minyerri	Wilora
Daguragu	Mount Liebig	Wurrumiyanga
Engawala	Mutitjulu	Yarralin
Epenarra	Nauiyu	Yirrkala
Galiwinku	Nganmarriyanga	Yuelamu
Gapuwiyak	Ngukurr	Yuendumu
Gunbalanya	Nturiya	AS Town Camps (17)
Gunyangara	Numbulwar	TC CLAs (5)

Rents charged under the new remote rent framework will exceed rents in urban areas of the NT. For example, a single mother with 3 children in a 4-bedroom house currently paying $136/week will soon be paying $280/week. The same family living in a 4-bedroom house in urban Alice Springs will only pay $194/week.

~100% of remote public housing tenants are Aboriginal whereas only 48% of urban public housing are Aboriginal. At present discrimination exists based on geographic location.

5.4. Building Control

Building Control in the NT is described as 2-tiered[v]. It would be more accurate to describe a 3-tiered system. The purpose of building control is to ensure National Construction Code (NCC) standards are met or exceeded.

5.4.1. Tier 1 Building Control Areas

Tier 1 requires full certification, including certificate of occupancy requirements and the end of construction. Tier 1 requires the highest standard of building standard monitoring and compliance. Tier 1 includes: (1) Darwin; (2) Alice Springs; and (3) Lake Bennett.

5.4.2. Tier 2 Building Control Areas

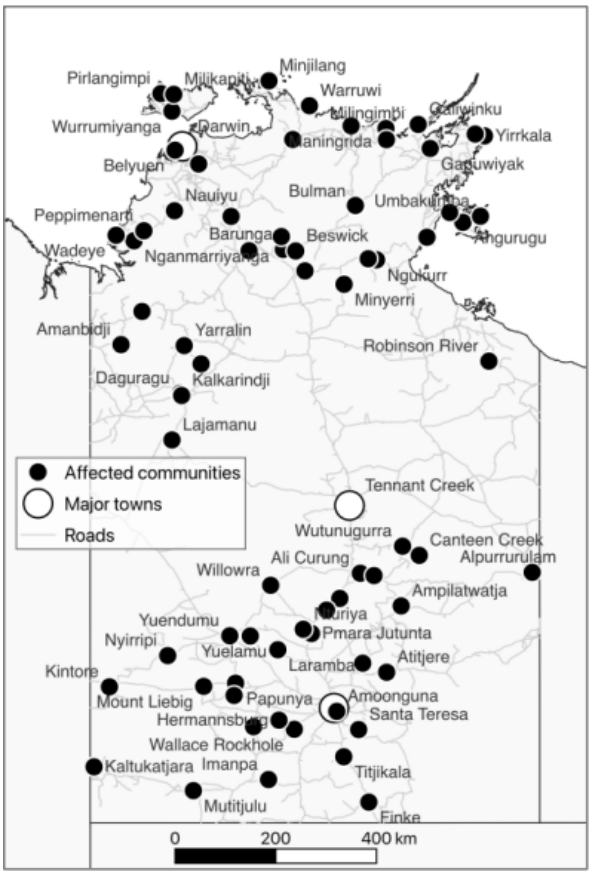
Tier 2 requires partial certification. For partial certification, a building permit is required before commencement of construction. During construction, a building certifier does not need to conduct inspections. At completion of work, a building certifier does not need to issue an occupancy permit. The builder does need to provide a builder's declaration.

Figure 3- Tier 2 Building Control		
1. Adelaide River	6. Jabiru	11. Namarada
2. Batchelor	7. Katherine	12. Pine Creek
3. Borroloola	8. Kings Canyon	13. Tennant Creek
4. Brewer Estate	9. Larrimah	14. Timber Creek
5. Elliott	10. Mataranka	15. Yulara

5.4.3. No Tier- Outside Building Control

Outside building control areas work doesn't require a permit, inspections, or a Registered Builder. There is little to ensure quality and standards are achieved outside the building control areas. Figure 2 has been reworked and appears below as Figure 4. This highlights the overlap between sites impacted by the proposed new remote rent framework and those outside the building control areas.

Figure 4- Geographic Locations Outside Building Control



Acacia Larrakia	Haasts Bluff	Nyirripi
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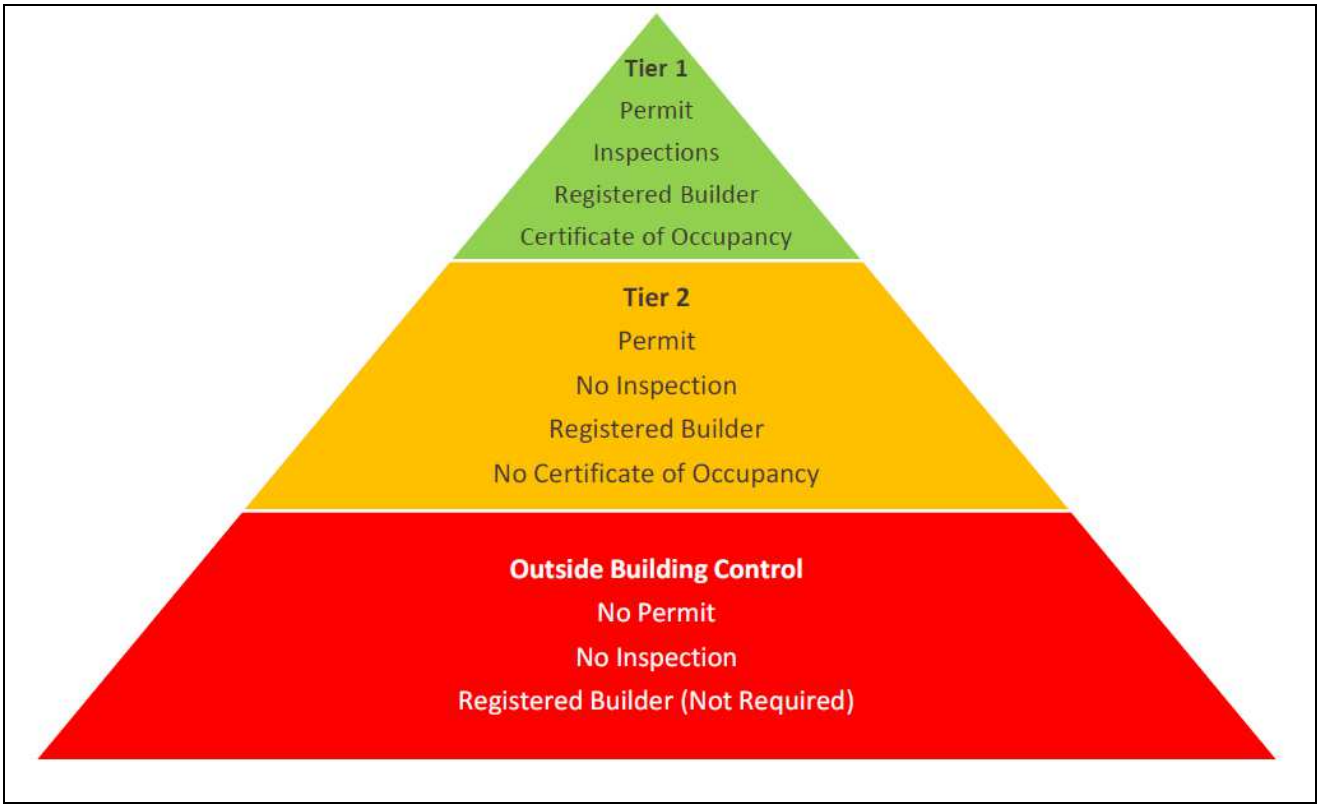
Bulla	Milingimbi	Wallace Rockhole
Bulman	Milyakaburra	Warruwi
Weemol	Minjilang	Willowra
Canteen Creek	Minyerri	Wilora
Daguragu	Mount Liebig	Wurrumiyanga
Engawala	Mutitjulu	Yarralin
Epenarra	Nauiyu	Yirrkala
Galiwinku	Nganmarriyanga	Yuelamu
Gapuwiyak	Ngukurr	Yuendumu
Gunbalanya	Nturiya	AS Town Camps (17)
Gunyangara	Numbulwar	TC CLAs (5)

5.4.4. Building Control- Infographic

The following pyramid outlines the protections in place within the 2-tiered building control systems and the area outside the building control system.



TCAC is concerned that areas outside of building control may have buildings constructed to a lower standard due to the lack of safeguards in place for ensuring standards are met. Put differently, the NT building control system purports to normalise regulatory differentiation on locational grounds as if this was demonstrably acceptable and benign regardless of the actual consequences.

Additionally, 'location' must be addressed in terms of anti-discrimination to ensure it is not used as a loophole or an 'excuse' for race discrimination and/or discrimination on other prohibited grounds.

5.5. Subdivision Guidelines- the Built Environment and Public Infrastructure

The amenity of the built environment and the quality of public infrastructure varies significantly between urban areas and other areas in the NT. Our observations relate to the 17 Alice Springs Town Camps. Similar observations could be made with respect to remote and very remote sites including the 73 remote communities covered by the National Partnership Agreement for Remote Housing NT.

> The NT Government possesses subleases over the 73 Remote Communities and 17 Town Camps that are part of the NPA for Remote Housing NT. These subleases include responsibility for houses, the built environment and infrastructure.

In 2009, 11 Town Camp Associations and 3 Aboriginal Corporations executed 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 Subleases with the CEO of Housing (NT) making the Department of Territory

Families, Housing and Communities (DTFHC) the Housing Authority for the Town Camps. The Subleases make the NT Government responsible for the Built Environment of the Town Camps including all Common/Public Spaces.

The amenity of the Alice Springs Town Camps is not consistent with the Alice Springs Town Council Subdivision Guidelines despite the Subleases between the Town Camps and the Commonwealth and between the Commonwealth and NT Government.

In February 2016, a Parliamentary Inquiry into housing in Aboriginal Town Camps was established by the NT Government. The Inquiry found that the Government had failed to provide an efficient and effective Public Housing service to Aboriginal people living in Town Camps. The committee noted the complexity of delivering services into these living spaces and made several recommendations. The Government, recognising the importance of resolving this complex problem, instituted a major review of all 43 Town Camps in the NT[vi].

The Review was tasked with examining and reporting back to Government in the following areas: (1) legislation and governance arrangements; (2) leasing and tenure arrangements; (3) housing quality, management, and ownership (4) municipal and essential infrastructure; (5) service delivery arrangements; (6) community aspirations; and (7) potential economic development opportunities[vii].

The engineering reports on municipal and essential services provided useful information about a narrow range of infrastructure in the built environment of the Town Camps including (1) Sewage; (2) Water; (3) Roads; (4) Drainage; and (5) Electrical Supply. The combined infrastructure figure of >$33 million was for the estimated cost of infrastructure upgrades required to meet current design standards for these 5 items (Appendix 3). Since the review in 2016 none of this work has been undertaken.

If the work of upgrade of these 5 items had been undertaken by the DTFHC then the Town Camps would still not meet the Subdivision Guidelines. These Subdivision Guidelines encompass a range of requirements including Crime Prevention Through Environmental Design; Environmental Health; Traffic Management; and access to Large Local Parks/Playgrounds. These standards should be met regardless of locations and tenure.

TCAC has had a 5-year partnership the University of Newcastle (UoN) School of Architecture and Built Environment (SABE).

Since 2019, the work has focused on the development of a Guide to Housing and Infrastructure Standards for the Town Camps and Local Decision-Making aligned Master-Planning. The Guide is a design manual incorporating a review of relevant regulations, industry guidelines and climate change research. The Master-Planning is led by residents, supported by architecture students, and aims to address the serious deficiency of housing and infrastructure standards on the Town Camps. The work has led to some funded projects and built outcomes.

The development of the Guide to Housing and Infrastructure Standards for the Town Camps was commissioned by TCAC in November 2019. The Terms of Reference provided by TCAC for the development of this resource outlined that in developing a 'Guide to Housing and Infrastructure Standards' that the UoN SABE consider a range of materials and their interface with the local context including the: (1) Alice Springs Town Council Subdivision Guidelines; (2) National Construction Code; (3) Australian Standard for Adaptable Housing; and (4) Livable Housing Guide.

> Location should not lead to discrimination in the quality of adherence to subdivision guidelines, the built environment and public infrastructure.

6. Socio-Economic Status

TCAC recommends that the word welfare be replaced with 'income support' in the definition of socio-economic disadvantage. The term welfare has negative connotations, and can be associated with the Welfare Ordinance Act, 1953 and the measures enacted under this legislation.

TCAC welcome the inclusion of socio-economic disadvantage. TCAC is curious to see how the inclusion of this term will address areas where there are shortfalls in accessing essential services by those who are disadvantaged.

TCAC has been investigating the issue of energy insecurity for example. The disconnection rate for Prepayment Meter (PPM) households in Alice Springs highlights a systemic issue. Currently, 91% of households disconnect at a rate of slightly over 1 time per week for a duration of approximately 7 hours per disconnection event.

This issue is replicated in other Jacana Energy serviced urban and regional centres. It is also replicated across the 73 Remote Communities that are serviced by PowerWater subsidiary Indigenous Essential Services (IES). There is not the time to consider the complex reasons for these high rates of disconnection and prepayment services are not the only contributing factor. It is however worth noting that there is the need to reconsider: (1) the relationship between Jacana Energy/IES and PPM customers; (2) the options for energy procurement available to PPM customers; (3) the protections from disconnection available to PPM customers; and (4) the information provided to PPM customers about their energy consumption and expenditure. At present there is a significant gap between post-payment/credit customers and PPM customers. Overall PPM customers are invisible.

7. Cultural Morning Practices

Since the Intervention the management of social housing in remote communities and many Town Camps shifted from community-controlled housing to the public housing.

This transition has had many impacts, one such impact has been in the support for cultural mourning practices.

Amongst Central Australian Aboriginal people mourning involves unique cultural observances including 'sorry camp'. Edwards describes 'sorry camp' as 'where family and other close associates spent much of their time during the period of mourning'. There are other observances historically observed by Aboriginal people that do not comfortably fit with contemporary circumstances, for example 'brush shelters could be dismantled and burned' whereas houses can 'not be dealt with in this way', an adaption to this reality is that residents 'vacate the house for a short period, have the internal walls repainted and another family occupy the dwelling'[viii].

8. Cultural Naming Conventions

TCAC has operated a Photo ID Service since 2008. This service was commenced in response to the impact of the Anti-Money Laundering and Counter-Terrorism Act. This legislation changed the way that banks conduct their business and required our stakeholders to produce Photo ID for over-the-counter bank transactions. Over 12,000 people have accessed this service on thousands of occasions for new cards, renewals, and replacement cards.

66-75% of Tangentyere Card customers have continued to renew these cards demonstrating that they have not transitioned to NT Government issued Photo ID. Unfortunately, drivers licencing sits at approximately 25% (for the Town Camps). The NT Government issued alternative to the drivers' licence is the proof of age card. There are several limitations to the proof of age card, the first that is shares with the driver's licence is in how variations in individual naming/nomenclature are addressed, and the second is that it lacks an address. The proof of age card can therefore not be used to approve an address for those processes that require one.

With respect to names there are many reasons for variation including: (1) cultural mourning practices; (2) the incorrect assessment by some systems that skin names are surnames; and (3) intercultural administration errors.

Ensuring that cultural naming conventions are understood and protected would be a good first step toward ensuring that NT Government proof of identity application processes are accessible. It should also ensure that the product can be used to full extent. In the case of the Tangentyere Card, the product has birth name and preferred names. While it includes the full range of detail the Tangentyere Card though widely accepted does not have the full range of acceptance that NT Government issued cards have. The address also needs to be added to the proof of age card.

9. Conclusion

TCAC acknowledges and appreciates the work of the NT Government in modernising the Anti-Discrimination legislation.

TCAC encourages the Territory to consider the submissions from stakeholders including but not limited to: NTCOSS; NT Shelter; and Darwin Community Legal Service as each has addressed Protected Attributes not covered by our submission.

Adding Geographic Location in a manner that protects people regardless of remoteness is a priority. Addressing challenges impacting those faced with socio-economic disadvantage is also a priority. The invisibility of stakeholders needs to be addressed as evidenced by the data presented on PPM disconnections.

Everyone needs access to high quality housing and essential services. There is no place in the NT for discrimination and stigmatisation based on location, socio-economic status, or culture. In addressing these specific attributes TCAC by no means seek to diminish other attributes that have not been addressed in this submission.

10. Appendix 1: NT Town Camps Review: Essential Infrastructure Upgrades

Name	Lot	Hectares	Sewage	Water Supply	Road Works	Drainage	Electrical	Misc.	Sub-Total
Akngwertnarre	5150	2.8	$0	$72,000	$426,000	$486,000	$257,000	$159,000	$1,400,000
Anthelk-Ewlpaye	3702	1.8	$0	$60,000	$1,692,000	$1,001,000	$1,001,000	$460,000	$4,214,000
Anthelk-Ewlpaye	3704	0.7	$117,000	$27,000	$62,000	$86,000	$43,000	$50,000	$385,000
Anthepe	5146	14.4	$601,000	$358,000	$848,000	$829,000	$501,000	$386,000	$3,523,000
Aper-Alwerrknge	5180	0.9	$117,000	$157,000	$110,000	$143,000	$72,000	$81,000	$680,000
Ewyenper-Atwatye	5189	28.6	$0	$84,000	$0	$0	$0	$20,000	$104,000
Ilparpa	5713	3.6	$204,000	$729,000	$607,000	$601,000	$358,000	$309,000	$2,808,000
Ilperle Tyathe	5149	8.7	$369,000	$599,000	$898,000	$658,000	$529,000	$376,000	$3,429,000
Ilyperenye	5708	2.7	$603,000	$323,000	$352,000	$372,000	$215,000	$233,000	$2,098,000
Inarlenge	3701	8.9	$761,000	$89,000	$873,000	$887,000	$587,000	$393,000	$3,590,000
Irrkerlantye									
Itwiyethwenge	5123	0.7	$438,000	$265,000	$779,000	$601,000	$143,000	$277,000	$2,503,000
Karnte	7850	7.5	$535,000	$93,000	$837,000	$715,000	$501,000	$331,000	$3,012,000
Lhenpe Artnwe	1733	10.9	$741,000	$47,000	$195,000	$372,000	$114,000	$186,000	$1,655,000
Mount Nancy	5135	4.3	$515,000	$603,000	$390,000	$372,000	$229,000	$263,000	$2,372,000
Mpwetyerre	2664	1.5	$160,000	$239,000	$267,000	$315,000	$157,000	$146,000	$1,284,000
Nyewente	5152	6.9	$0	$97,000	$0	$0	$0	$21,000	$118,000
Yarrenyty Arltere	5195	90.6	$0	$26,000	$0	$0	$0	$13,000	$39,000
Total			$5,161,000	$3,868,000	$8,336,000	$7,438,000	$4,707,000	$3,704,000	$33,214,000

11. References

[i] Regional Development Australia: Northern Territory. (2010). Regional Plan 2010-2012. Canberra, ACT: Australian Government

[ii] Deloitte Touche Tohmatsu. (2017). Living on the edge: Northern Territory Town Camps Review. Darwin, NT: Department of Housing and Community Development.

[iii] DTFHC. (2021b). Tenant Account Reconciliation and Remote Rent Framework: Stakeholder Reconnect Discussion Guide. Department of Territory Families, Housing and Communities.

[iv] Markham, F. & Klerck, M. (2022), Simplifying the system or deepening poverty? The new Remote Rent Framework in the Northern Territory (Topical Issue No. 3/2022), Centre for Aboriginal Economic Policy Research, Australian National University.

[v] https://nt.gov.au/property/building/build-in-a-controlled-area/building-control-areas/requirements-in-building-control-areas.

[vi] Deloitte Touche Tohmatsu. (2017). Living on the edge: Northern Territory Town Camps Review. Darwin, NT: Department of Housing and Community Development.

[vii] Ibid.

[viii] Edwards, B. (2013). Changes in Pitjantjatjara mourning and burial practices. *Australian Aboriginal Studies*, 1, p. 31-44