

To the members of the Legislative Scrutiny Committee,

I have written this submission to voice my opposition the passage of the *Care and Protection of Children Legislation Amendment (Every Child Matters) Bill 2026*.

I write this submission as a concerned community member. I also work in the domestic, family and sexual violence (DFSV) prevention sector, where practice is informed by a strong evidence base about what supports safety, recovery and long term outcomes for children and families.

Having reviewed the Bill, I am concerned that the proposed reforms do not appear to be grounded in that evidence base. There are several aspects of the Bill that raise significant risks for children, families, and the broader child protection system.

One area of particular concern is the proposed two year cap on short term protection orders. Productivity Commission data from 2025 indicates that approximately 70% of children in out of home care in the Northern Territory remain in continuous care for longer than two years. The passage of this bill would mean that a significant proportion of children in out of home care would be placed on a trajectory towards a long term order.

This has serious implications for rates of reunification. It also appears to be inconsistent with the Department of Children and Families' own *Safer Together* policy, which emphasises the importance of keeping children affected by domestic and family violence safely connected to the non-offending parent wherever possible. A rigid two year timeframe does not reflect the realities faced by families, particularly where access to housing, services and support is limited.

The proposed reforms risk increasing the number of children who are permanently removed from their families, not necessarily because reunification is unsafe, but because it is not achievable within prescribed timeframes.

- I recommend that the Committee require the Northern Territory Government to consider the economic implications of these reforms. Specifically, there is a need to examine the comparative cost of placing a child in residential care against the cost of investing in housing and wrap around support services for families.

Without adequate investment in the underlying drivers of child protection involvement, including housing insecurity, substance use support, and culturally appropriate services, the reforms risk creating significant long term costs for the system without improving outcomes.

Housing is a critical factor in reunification. Current wait times for emergency and social housing in the Northern Territory can extend from four to ten years. In this context,

expecting families to achieve reunification within a two year timeframe is not realistic and risks embedding child removal as a default outcome.

I am also concerned about the implications of the Bill for people reporting domestic and family violence and seeking support to leave unsafe situations. Where victim-survivors perceive that engaging with systems may increase the risk of child protection involvement, this can act as a deterrent to seeking help.

- I recommend that the Committee require the Northern Territory Government to engage with frontline services before progressing any amendments to the Care and Protection of Children Act 2007. This should include meaningful consultation with the DFSV sector, housing services, health services and the Aboriginal Community Controlled sector.

I am also concerned about the implications of the Bill for workforce capacity. The Northern Territory child protection system is already under significant strain. According to the Acting CEO of the Department of Children and Families, Karen Broadfoot, only approximately 75% of child protection roles are currently filled across the Northern Territory. Expanding intervention and compliance requirements without addressing this capacity constraint is likely to place further pressure on an already overstretched workforce and may have negative impacts on recruitment and retention.

- I recommend that the Committee require the Northern Territory Government to engage with relevant unions and workforce representatives to assess the impact of these reforms on staffing and system capacity before any legislative changes are made.

There is a strong evidence base demonstrating that the best outcomes for children are achieved when families are supported to safely care for them. The proposed reforms appear to move away from that evidence base by expanding intervention and increasing reliance on long term removal, without corresponding investment in the supports required for families to succeed.

For these reasons, I respectfully request that the Legislative Scrutiny Committee carefully examine whether the Bill is consistent with existing evidence, system capacity, whether it will achieve its stated objective of improving outcomes for children, and whether the Bill has sufficient regard to the rights and liberties of individuals in the Northern Territory.

I would be pleased to attend any public hearing, and I would welcome the opportunity to address the Legislative Scrutiny Committee directly to explain my concerns.