Aboriginal Housing
Northern Territory

October 2026

Submission to the Closing the Gap Review 2026 Target 9a (Second AHNT Submission)

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1. Executive Summary

Aboriginal Housing Northern Territory (AHNT) submits that current Northern Territory remote housing agreements and reporting arrangements do not adequately measure progress against Closing the Gap Target 9a. Target 9a is a people-based outcome: by 2031, 88% of Aboriginal and Torres Strait Islander people should live in appropriately sized housing. In contrast, the Partnership Agreement Joint Steering Committee for Remote Housing NT (JSC-RHNT) and the Federated Funding Agreement Northern Territory Remote Housing (FFA NTRH) have reframed the objective around halving the proportion of properties recorded as overcrowded. This shifts attention from whether more people are appropriately housed to the status of tenancies and housing stock.

The interim metric reported to the JSC-RHNT relies on Tenancy Management System data, which records only recognised tenants and occupants and cannot capture visitors, people experiencing homelessness or other unmet demand. It may also be affected by outdated records, incorrect property information, household changes, inconsistent interpretation of occupancy standards and over-tenanting practices. As a result, recorded reductions in overcrowding may reflect improved data quality or tenancy management rather than an increase in the number of people appropriately housed.

The available delivery data does not show a uniform relationship between new construction and the reported proportion of overcrowded properties. Of 48 communities receiving new houses, overcrowding increased in 13 (27%), decreased in 33 (69%) and was unchanged in two. Among 50 communities without new builds, overcrowding increased in 20 (40%), decreased in 23 (46%) and was unchanged in seven. These results demonstrate that the present property-based measure is influenced by allocation, tenancy administration and data practices and cannot, by itself, establish whether the $4 billion investment is advancing Target 9a.

AHNT recommends that governments: (1) revise the JSC-RHNT and FFA NTRH objectives so they explicitly focus on increasing the proportion of Aboriginal people living in appropriate housing; (2) clean and validate tenancy, property and waiting-list data as an urgent system priority; (3) report quarterly on changes in community housing waitlists and the number of individual overcrowded households resolved, alongside construction outputs; (4) strengthen tenancy management capacity and align public reporting with National Regulatory Scheme for Community Housing performance measures; and (5) provide the JSC Aboriginal caucus with transparent access to planning tools and data. These reforms are necessary to support Priority Reform 4 on shared access to data, Priority Reform 2 on building the community-controlled sector, and informed future transfers of housing functions to community control.

2. Introduction

Aboriginal Housing Northern Territory (AHNT) is the peak body for the Aboriginal Community-Controlled Housing sector in the Northern Territory (NT). AHNT represents and advocates for Aboriginal community-controlled housing organisations across the NT. AHNT works to influence policy, improve practice and promote agency and transparency in decision-making around Aboriginal housing. AHNT advocates for a future where Aboriginal people have housing that is safe, secure, culturally appropriate and reflective of community needs.

AHNT has 26 Aboriginal Community-Controlled Housing Organisation (ACCHO) members that provide housing related services including: (1) housing (as landlord or housing authority); (2) housing design and construction; (3) housing management (tenancy and property management); (4) housing repairs and maintenance; (5) housing, municipal and essential services; and (6) tenancy support. In addition, the four N.T. Land Councils are AHNT affiliate members.

AHNT is a signatory to the Partnership Agreement Joint Steering Committee for Remote Housing NT, and via our membership of the Aboriginal Peak Organisations NT (APONT) sits on the Northern Territory Executive Council on Aboriginal Affairs. At a national level we are a member of the National Housing Policy Partnership.

3. Focus of this Submission

AHNT welcomes the opportunity to provide a second submission to the Productivity Commission Closing the Gap (CtG) review 2026 focused this time upon CtG Target 9a.

Under the Closing the Gap review framework, AHNT's submission examines progress against Target 9a and assesses the extent to which the indicators used under the jurisdictional housing agreement, the Partnership Agreement Joint Steering Committee for Remote Housing NT, to measure this Target between censuses. In addition, this raises issues of data sharing – Priority Reform 4 Shared access to data and information at a regional level and the way this reporting addresses the readiness of the jurisdiction to support transfers of properties to community-control and sector development – priority reform Area 2 Building the community-controlled sector.

4. Unpacking the relationship between the CtG Target 9a, the Partnership Agreement Joint Steering Committee for Remote Housing NT, and the Federated Funding Agreement Northern Territory Remote Housing

The Partnership Agreement Joint Steering Committee Remote Housing NT (JSC-RHNT) states that the National Agreement on Closing the Gap (CtG) Target 9a's stated aim, "*By 2031, increase the proportion of Aboriginal and Torres Strait Islander people living in appropriately sized (not overcrowded) housing to 88%*", drives the new building work that it undertakes.

The CtG 9a Target indicator, "*The proportion of Aboriginal and Torres Strait Islander people living in appropriately sized (not overcrowded) housing*", is measured by the "*total*

number of Aboriginal and Torres Strait Islander people", divided by "*the number of Aboriginal and Torres Strait Islander people living in appropriately sized (not overcrowded) dwellings"*. It is a person focused indicator.

In the preamble of the Partnership Agreement Joint Steering Committee for Remote Housing NT (JSC-RHNT) it is stated that, "The Agreement will work toward the achievement of socio-economic Outcome 9 under the National Agreement" (clause1.17). And later that this agreement, "sets out the principles and objectives that will inform implementation of the funding agreements to work towards achieving outcomes relating to Target 9a through the supply and maintenance of appropriate remote housing" (clause 1.18). Similarly the Federated Funding Agreement Northern Territory Remote Housing (the FFA NTRH) - which the JSC-RHNT is designed to support - states "This Agreement reinforces the Commonwealth and Northern Territory's commitment to the National Agreement on Closing the Gap (National Agreement), including the priority Reforms, and Outcome 9— Aboriginal and Torres Strait Islander people secure appropriate, affordable housing that is aligned with their priorities and need".

5. The disjunct between the CtG Target 9a, the Partnership Agreement Joint Steering Committee for Remote Housing NT, and the Federated Funding Agreement Northern Territory Remote Housing

However, there is an inherent disjunct in the objectives of both the JSC-RHNT and the FFA-NTRH agreements and CtG Target 9a. This occurs in the way both agreements interpret the CtG 9a target.

In the preamble of the JSC-RHNT Agreement clause 1.17 states that CtG "Outcome 9 recognises the importance of housing to improve the health and wellbeing of people living in overcrowded conditions." This introduces overcrowding as a key component of the Target 9a. While clause 1.18 talks of "appropriate remote housing". In the Objectives of the Agreement the emphasis upon overcrowding is clearly stated, "2.1 b) halve overcrowding through the delivery of new housing and improve existing housing in the remote housing system over 10 years". This is the only objective related to 9a.

This reinterpretation of CtG 9a is clearly outlined in Clause7.5 Implementing Closing the Gap.

"To give effect to Target 9a under the National Agreement, the Parties agree to:

a. i. The Agreement will contribute directly to achieving Target 9a in the Northern Territory by ***reducing the current unacceptably high levels of overcrowding*** *(emphasis added)* and increasing the proportion of Aboriginal

people in remote communities living in appropriately sized (not overcrowded) housing

iii. The goal of the Agreement is that by 2034, overcrowding in remote communities will be halved, leaving further work required to reach the ***national target of 88% of remote dwellings not overcrowded*** (emphasis added)" p9.

Note that now instead of increasing the number of people housed, the target is to reduce the number of overcrowded houses. The first highlighted section in (a.i) introduces a new metric- reducing the unacceptably high levels of overcrowding, in addition to the CtG Target. The second part highlighted in (a.iii) reinterprets housing 88% of Aboriginal and Torres Strait Islander people in appropriate houses to having 88% of those housed not being in overcrowded houses.

This reinterpretation is consistent with the Federated Funding Agreement Northern Territory Remote Housing (the FFA NTRH) which also pivots the CtG Target 9a to be a target that reduces overcrowding. "The purpose of this Schedule is to reduce overcrowding and improve housing quality in Northern Territory remote communities and town camps". (Schedule Purpose).

The emphasis in both agreements becomes to reduce overcrowding as the way to achieve the outcome "*increase the proportion of Aboriginal and Torres Strait Islander people living in appropriately sized (not overcrowded) housing to 88%*". Thus, interpreted with an emphasis upon the sub-clause of the target 'not overcrowded', so that the objective now becomes to 'halve overcrowding' (clause 2.1b) which would increase the total number of people appropriately housed i.e. not living in overcrowded houses, but would not address getting more people housed in total.

While the Closing the Gap Target does not explicitly explain why the term "not overcrowded" was included, it is reasonable to assume it was intended to ensure that people counted as being appropriately housed were living in homes that were not overcrowded. This would help prevent reductions in waiting lists from being achieved by increasing occupancy levels in existing dwellings beyond their intended capacity. It may also have been included to ensure that reported improvements in housing outcomes were not artificially inflated by counting additional occupants in homes that lack sufficient space to accommodate them appropriately. Other riders such as 'habitable', 'affordable' or 'safe and secure' could also have been used.

6. What is being measured

The Closing the Gap Target 9a outcome is measured through data collected during the National Census. It attempts to count all Aboriginal people.[1] A subset of the data collected is whether people report that their property is "Appropriately sized dwellings are those where no extra bedrooms are required to adequately house the usual residents".[2]

The Closing the Gap denominator is the total Aboriginal (& Torres Strait Islander) population's relationships to being housed (Figures 1 & 2). This includes people housed (whether in appropriately sized properties or not), those not housed at all, those who may have a roof over their head but looking for a house, and those that are homeless - in its various guises. The aim is to have 88% of this total population appropriately housed.

[1] The accuracy of the census data to reflect Aboriginal populations, particularly remote communities is a contested matter. Williamson, B. et al 2021 "Indigenous Peoples and the Australian census: value, trust, and participation". *Australian Population Studies* Vol 5 No 2 pp1-14.

[2] "There is no universally accepted definition of what constitutes an overcrowded household. The ABS uses the CNOS. The CNOS is widely used in Australia and internationally. The relevance and appropriateness of CNOS in depicting dwelling utilisation for Aboriginal and Torres Strait Islander people has not been assessed. Classification of 'Levels of overcrowding specific to Australian conditions' is to be considered under the Data Development Plan endorsed by the Joint Council on Closing the Gap in August 2022". Socio-economic outcome area 9 - Aboriginal and Torres Strait Islander people secure appropriate, affordable housing that is aligned with their priorities and need - Dashboard - Closing the Gap | Productivity Commission

Figure 1 Target 9a relationships- people based

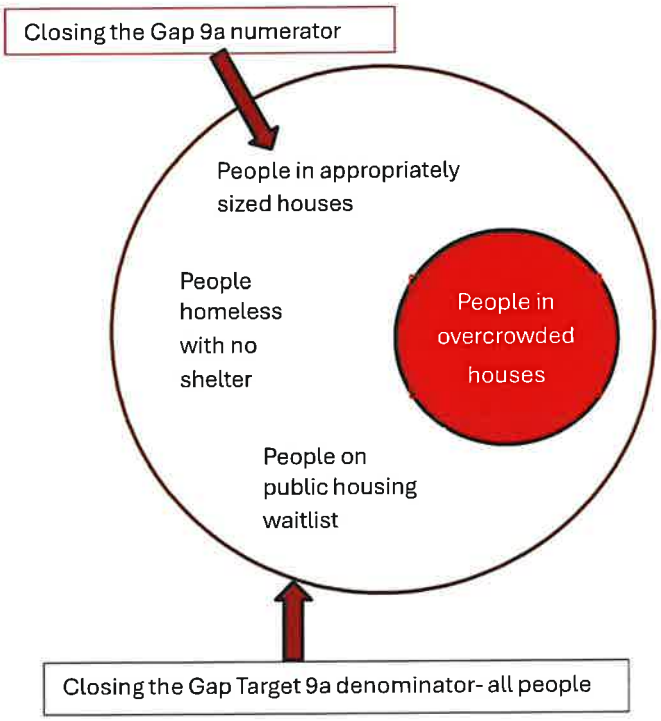


Figure 2 How the CtG Target is calculated

$$\frac{\text{Number of people appropriately housed}}{\text{Total number of people}} \times 100 = 88\%$$

In between the Census data what the JSC-RHNT relies upon and what is reported to the quarterly meetings of the JSC-RHNT by the NTG Department of Logistics and Infrastructure (DLI) is data based upon NTG Department of Housing Local Government & Community Development (DHLGCD) tenancy data collated from the NTG Tenancy Management System- (TMS). The TMS records only those officially listed as tenants and occupants (e.g. children). It does not and cannot collect visitor overcrowding, nor does this data show other unmet demand, i.e. homelessness. It measures whether a house is officially overcrowded or not, i.e. there are more people on the tenancy than meet the Canadian National Occupancy Standard (CNOS).

Under the JSC-RHNT partnership agreement what is being measured and reported to the JSC as indicators of the outputs of the $4b investment to reduce overcrowding as the

means to address the CtG Target 9a, is the change in percentage of overcrowded properties.

Figure 3 Overcrowded house relationships- property based.

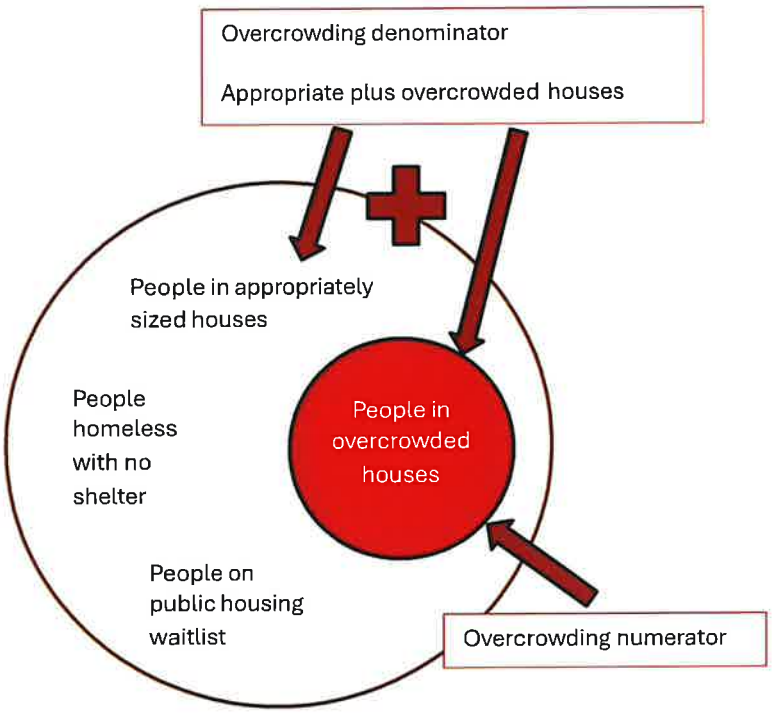


Figure 4 How the JSC-RHNT overcrowding reporting is calculated

$$\frac{\text{Number of overcrowded houses}}{\text{Total number of houses}} \times 100 = X\%$$

What the Closing the Gap Target is measuring is people related, what the two NT agreements are measuring is recorded overcrowding- a tenancy or property related metric.

This distinction is important, as the two concepts are often conflated. For example, *The Australian* newspaper in two articles published on the same day used the same data to say two different things.

"The project has, however, resulted in 360 new houses in two years and a small reduction in the percentage of remote houses classified as overcrowded (from 53.4 per cent in 2024 to 49.8 per cent this month)".[3]

"So far 360 houses have been built in remote communities and town camps and this has reduced the percentage of Aboriginal people living in overcrowded homes in the NT by a little more than 3 per cent to 49.8 per cent".[4]

The first report correctly interprets the data being reported.

The second statement based on the data presented is wrong. There could have been a reduction in people living in overcrowded houses, but the data only shows the proportion of the housing stock that is overcrowded.

7. Overcrowding

What is overcrowding? Here are three understandings or definitions.

First, what people who live in houses and those who should be managing tenancy on the ground would think of as overcrowding. This can be described as people staying in houses unofficially as well as those who are sanctioned by the state to be on the tenancy, who cause the property to be overcrowded. These people may or may not be tenants' families, or extended families- visitors or it may be that children have grown up and need their own rooms from when the tenancy started. These parameters describe overcrowding as people would commonly understand it, the lived experience understanding.

Secondly, how the Census records the number of people normally resident at a property.[5] This is enumerated as a ratio of people present to the number of bedrooms in a property, based on gender and age assumptions, the Canadian National Occupancy Standard (CNOS) this is called Housing suitability (HOSD).[6] The applicability and relevance of this measure to Aboriginal and Torres Strait Islanders is contested.[7] In addition the Census also endeavours to count people living rough and in other temporary or transitional housing. It attempts to count all people and their living circumstances.

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[3] Alice Springs 'like the Middle East' as remote housing crisis bites | The Australian Accessed 22-07-2026.
[4] Labor's $4bn NT remote housing plan falling behind schedule | The Australian Accessed 22-07-2026.
[5] The definition is "those who usually live, or intend to live, at the property for a total of six months or more. Number of persons usually resident in dwelling (NPRD) | Australian Bureau of Statistics
[6] Housing suitability (HOSD) | Australian Bureau of Statistics
[7] Dockery, A.M., Moskos, M., Isherwood, L. and Harris, M. (2022) *How many in a crowd? Assessing overcrowding measures in Australian housing,* AHURI Final Report No. 382, Australian Housing and Urban Research Institute Limited, Melbourne, https://www.ahuri.edu.au/research/final-reports/382, doi: 10.18408/ahuri8123401

Lastly, between Census, the JSC uses the NTG DHLGCD Tenancy Management System (TMS) data on the number of people they record as being tenants in a property. This dataset does not count visitors- short or long term.

What this data shows is the number of people the housing officer has signed up to be a tenant in a house. In some cases, if this leads to overcrowding this is what could be termed state sanctioned overcrowding - or over-tenanting. Aspects of tenancy management practices which lead to this are discussed later.

8. Why building new houses does not reduce "overcrowding" as measured by JSC reporting

At the JSC-RHNT meeting- June 2026 the **FFA Capital Works Quarterly Delivery Report** by the NTG DLI showed a reduction in overcrowded houses of 3.4% over the period of 06/2024-31/03/2026. (FFA Attachment F A3).[8]

It would seem logical- based on the use of this data that it could be expected that when new houses are built, levels of overcrowding reduce, even if this isn't causative, is there at least a correlation? However, as shown in Table 2, in many communities this is not the case, in fact the percentage of **overcrowded houses went up in 13 (27%) of the 48 communities where new houses were built**. While it also increased by 40% in 20 of the 50 communities where no new builds had yet occurred. When considering those 33 communities where overcrowding increased in the reporting period (Table 3), this means that 39% of them had new houses built and 61% had no new builds.

Conversely, the percentage of **overcrowded houses went down in 33 (69%) of the communities that had new builds. But it also went down in 23 (46%) of the communities with no new builds** (Table 2). When considering those 56 communities where overcrowding decreased in the reporting period (Table 3), 59% of them had new houses built and 41% had no new builds.

The balance of nine communities showed no change in the percentage of overcrowded houses: two with new builds and seven communities that had no new builds (Table 2).

There was no uniform correlation between building new houses and reducing the percentage of overcrowded houses. In some communities the percentage of

[8] This attachment showed overcrowding data (based upon TMS household data per community) and new builds planned and completed in each of 98 communities. It reported an overall reduction in overcrowded across these 98 communities from 51.4% to 48.0%. As it was presented as part of the new building program report, it would be logical to assume that the reduction in the percentage of overcrowded houses was being claimed to be related to the building program.

overcrowded houses went up after new builds. Also, the percentage of overcrowded houses went down in communities with no new builds.

Table 1 Communities with new build/no build by number and change in overcrowding in total

Type of change	Increase in overcrowding		No change		Decrease in overcrowding		Total communities
New builds	13	27%	2	4%	33	69%	48
No new builds	20	40%	7	14%	23	46%	50

Table 2 Number of communities with build/no build by changes within category of overcrowding increase, no change or decrease

Of communities where there was an increase in overcrowding.		Of communities where there was no difference		Of the communities where there was a decrease in overcrowding	
build	no build	build	no build	build	no build
39%	61%	22%	78%	59%	41%

Overcrowding is not necessarily being reduced by building new houses.

In fact, the NTG *Our Community, Our Future, Our Homes* (OCOFOH) program recognises this disjunct between new houses and increased overcrowding.

In the FAQ section they answer the question,

How can overcrowding increase in a community if new homes have been built?

With this reply:

New homes are generally allocated to people on the wait list, in consultation with local decision making groups. People who are on the wait list are not classified as tenants until they are allocated a home, so as the number of new homes increases, so does the number of tenants who are housed.

Every effort is made to ensure new homes are not overcrowded when first tenanted, however this is not always possible.[9]

Therefore, the overcrowded houses stay overcrowded, unless those extra tenants have a transfer request with the DHLGCD and are allocated a newly built house, a house is demolished and replaced with a larger one or the whole household transfer to a newly built house, in which case their old property is taken out of stock for repairs.

9. Data problems

Firstly, why are there officially overcrowded houses. What are the tenancy management practices that lead to state sanctioned overcrowding/over-tenanting?

If this data was derived only from National Regulatory Scheme for Community Housing (NRSCH) accredited housing provider reports, it would be expected that official figures for the number of tenants (including dependents) would match the CNOS guidelines for occupancy. If a NRSCH provider was oversubscribing tenants to properties, they would be at risk of losing their registration. In other words, tenancy data figures would not be collecting overcrowding data.[10]

However, in the non-regulated public housing sector this widely occurs. Of the 98 communities identified in the FFA Attachment A3, only six record zero tenancy overcrowding. Five of these are Alice Springs Town Camps. Given that it is correct that the tenancy figures shouldn't be collecting overcrowding figures if the correct CNOS ratio is being used, the question that is highlighted here is why are eleven Alice Springs Town Camps and the other 80 communities showing over-tenanting at all?

There are several possible explanations for this overcrowding in DHLGCD TMS data. Errors and problems with how data is interpreted and recorded could be an issue.

One issue could be poor record keeping. Past 'other' tenants still being listed where a tenancy has stayed with the same original main or 'primary' tenant and no-one updates the tenancy record. This would be an issue where there is a shortage of housing officers and a related lack of engagement.

A second reason is that in the past there was an approach that to have a tenancy meet the maximum realisable rent from any given property there was encouragement to sign more people, in the hope that some of them would contribute to rent payments.

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[9] Frequently asked questions | Our Community. Our Future. Our Homes. Accessed 21-07-2026

[10] Neither the NRSCH regulated or the unregulated public system records data on unofficial residents overcrowding properties, other than in tenancy notes and SHIP referrals to tenancy support services.

Changes in family demographics can also be an issue. As children grow up and need their own bedroom, this would change the number of bedrooms required to house that family under the CNOS guidelines. However, if there is nowhere to move to, then the family is now overcrowding a property where previously they matched the entitlement.

These are all to a degree legacy issues, they reflect the history of the tenancy and property. A related problem is where the housing stock itself has an error, such as the wrong number of bedrooms recorded for a property, throwing out the tenants to bedroom calculation.

Interpretation may be an issue, where an analysis based on the raw numbers of tenants doesn't consider how these may be configured in a household. For example. two adults (a couple) sharing a room with three other adults in a four-bedroom house is not overcrowding but could be recorded as such. Similarly, gender and age of children impact room sharing, and depending on whether it is possible or becomes inappropriate for children to share, would impact tenancy ratios.

And sometimes it is just hard to discuss with tenants who they should have listed on their tenancy, especially if this could mean that a parent may lose custody if it looks like they are not housing a child. Or it could cause family tensions if someone is being asked to leave the tenancy.

There are a range of issues and errors in this data that makes the conclusion that houses are over-tenanted problematic.

Based on this information, overcrowding data derived from TMS data could be dramatically reduced by correcting errors in the TMS database. This would artificially look like a major leap forward and potentially could be achieved on paper without building any new houses, but it would be caught out when the Census data is reported-if of course people are confident to state this on their Census form- given some people may be frightened to report their real overcrowding in case they're worried about being punished as 'bad' tenants for not managing their visitors.

A further question is, why does building more houses not reduce overcrowding and why does overcrowding sometimes increase?

An answer is suggested by the OCOHOF quote that, "Every effort is made to ensure new homes are not overcrowded when first tenanted, **however this is not always possible** (emphasis added).

The level of inspections in communities also correlates with overcrowded housing figures. An analysis of inspection data matched to overcrowded tenancy data shows a

correlation between higher inspection and lower overcrowding (and the inverse), at least for those communities served by and Community Housing Provider or with 3rd party TMSS.

However, where the DHLGCD is the sole provider of tenancy management services it is harder to detect a trend. With a third of those communities (both with new builds) with 90-100% inspection rates still reporting increased overcrowding. And seven communities with below 36% inspection rates having decreased or static overcrowding. What is clear from the DHLGCD data is that communities receiving new housing generally experienced reductions in overcrowding, demonstrating a strong correlation between additional housing supply and improved overcrowding outcomes. . Echoing the OCOFOH statement that: *Every effort is made to ensure new homes are not overcrowded when first tenanted, however this is not always possible.*

This indicates good tenancy management strategies are potentially being deployed at the sign-up stage, which may not be being sustained over time.

Reductions in overcrowding may be an artifice of improved tenancy management proficiency and accuracy rather than changes brought about by increases in housing stock.

To reduce real overcrowding in existing officially overcrowded properties would require that, when a new house was built, people would be removed from an existing "over-tenanted" property. However, this is unlikely to be accepted in communities who expect that the unofficial overcrowding people in houses get housed, i.e. a reduction in the total number of Aboriginal & Torres Strait Islander people who were not housed (Closing the Gap Target 9a). Mostly this is what happens in communities. At Housing Reference Group meetings people are taken off the public housing waitlist for that community. These people are invisible to the current overcrowding metric based on the TMS data.[11]

[11] OCOFOH data shows even more complexity in overcrowding metrics when no houses are built, see for example Banjari, Appendix A.

10.System reform

There is a need to overhaul the current tenancy management practices to address the issue of state sanctioned overcrowding/over-tenanting.

To do this would require an increase in the number of tenancy officers and as a step towards transparency of system health the DHLGCD should align its reporting to NRSCH KPIs. This does not mean that it would be an expectation that these are currently being met but would allow any community thinking of taking on tenancy (or property) management a clear picture of the tenancy environment in their community.

Given that the FFA is only completing its second year and that there are still many properties to be built, a concerted effort to correct this erroneous overcrowding data now would be valuable.

Accurate tenancy data should be a requirement of government system improvements before any transfers to community control take place.

11.Recommended measures to address disjunct and data issues to better meet the Target 9a outcome.

11.1 Review of the FFA and Partnership Objectives

The Partnership JSC-RHNT and the Federated Funding Agreement Northern Territory Remote Housing should be reviewed to align with the indicator of the CtG Target 9a intention to increase "The proportion of Aboriginal and Torres Strait Islander people living in appropriately sized (not overcrowded) housing."

This would require a rewording of the preamble of the JSC-RHNT Agreement clause 1.17 to remove the selective quote "Outcome 9 recognises the importance of housing to improve the health and wellbeing of people living in overcrowded conditions." This is one of many aspects of appropriate housing noted in the "Historical and ongoing target context", it is not a target in and of itself that should be raised above matters noted as reasons to increase the number of people being housed. [12]

Likewise, the Objectives of the Agreement should be reworded to emphasis "increasing the proportion of people appropriately housed (as a percentage of the total population) through the delivery of new housing and improve existing housing in the remote housing system over 10 years".

[12] Socio-economic outcome area 9 - Aboriginal and Torres Strait Islander people secure appropriate, affordable housing that is aligned with their priorities and need - Dashboard - Closing the Gap | Productivity Commission

Similarly, Clause7.5 Implementing Closing the Gap should also be reworded.

"To give effect to Target 9a under the National Agreement, the Parties agree to:

a. i. The Agreement will contribute directly to achieving Target 9a in the Northern Territory by increasing the proportion of Aboriginal people in remote communities living in appropriately sized (not overcrowded) housing

iii. The goal of the Agreement is that by 2034, following the delivery of the $4b remote housing program, a reduction in the need for new housing will have occurred, recognising that further work will still be required to reach the national target of 88% of Aboriginal people in the NT be housed in appropriate housing.

This correction would also be required in the wording of the Federated Funding Agreement Northern Territory Remote Housing (the FFA NTRH) to, "The purpose of this Schedule is to increase the proportion of Aboriginal people appropriately housed and improve housing quality in Northern Territory remote communities and town camps". (Schedule Purpose).

The emphasis in both agreements would then return to the Target 9a intent "increase the proportion of Aboriginal and Torres Strait Islander people living in appropriately sized (not overcrowded) housing to 88%". This would focus the programs on people, not property/tenancy management.

11.2 Appropriate metrics to measure progress

Once there is agreement on what should be measured, changes will be needed to the underlying data and reporting arrangements to ensure they accurately measure progress against the intended outcome.. The tenancy and property metrics reported to JSC-RHNT require modification, to ensure that the JSC-RHNT is able to track progress against Target 9a, rather than what is reported currently, which is the proportion of the current housing stock across the whole remote footprint which has officially overcrowded tenancies. To this end data needs to capture what is the unmet need for housing and then what impact does the building program have on this population.

Returning to Figure 1, the total population of people, includes those appropriately housed, those who are housed currently in overcrowded houses, those who are homeless and those on the waitlist for housing. The TMS provides the first figure, those appropriately housed, it also provides the second- those needing a bigger house, or needing some people currently listed as tenants to be housed elsewhere. The DHLGCD also holds a waiting list of people not currently housed who wished to be. As has been noted it is from this list that most people are drawn to be housed in the newly constructed

houses under the FFA. Changes to the size of the waitlist is not being reported to the JSC-RHNT. What is not captured in the TMS and waitlist data held by the DHLGCD are those homeless people not engaged with the system. This shortcoming needs to be addressed through better engagement with those people by support services to get people on the waitlist, so they would no longer be invisible between census's (if they get noticed even then). Whilst recognising that due to the length of time (around 8 years) that can be experienced, some people feel that it is futile to be on the list.

An urgent priority should be to clean up the data to make an effective and trustworthy housing waitlist. This metric would show, as the OCOFOH website states, the impact of new house allocations on the demand side metric of the waitlist. This would require an investment in system improvement.

Reductions in waitlist for communities as well the number of actual individual overcrowded houses that are no longer overcrowded should be being reported to the JSC-RHNT quarterly meetings as the appropriate metrics to monitor the progress of the $4b investment to meet CtG Target 9a.

11.3 Appropriate planning tools

The current planning tool to determine new house construction in the remote footprint the DLI Remote Housing Needs Assessment Model (RHNAM) relies upon estimated resident data and current overcrowding metrics. Given the concerns raised in this paper regarding the accuracy of the TMS overcrowding data and the lack of other unmet need reporting tools such as the DHLGCD Housing waitlist, AHNT recommends that the RHNAM be reviewed to correct for these data deficiencies.

Changes in modelling undertaken by DLI using the RHNAM should e reported to the JSC-RHNT quarterly meetings.

12. Priority Reform performance

Speaking at the recently held Housing First Nations National Conference,[13] Shane Hamilton (CEO Aboriginal Hostels Limited) suggested that in order to consider the effectiveness of any program targeting Aboriginal (and Torres Strait Islander) people it should be measured not so much against the CtG Targets, but rather does it embody the CtG Priority Reforms.

Priority Reform 4 Shared access to data and information at a regional level: currently the data being shared through the partnership agreement does not in AHNT's view

[13] Hamilton. S, 2026 'Remaining Focused on the Big Picture' Keynote Housing First Nations National Conference. Aboriginal and Torres Strait Islander Housing Queensland 20-1 October 2026 Brisbane

adequately reflect the intent of Target 9a, nor is the Aboriginal caucus of the JSC-RHNT kept up to date with data that reflects meaningful understands of the impact of the $4b investment. If JSC members- particularly the 'Aboriginal caucus' do not have access to the planning tool and are not being updated on changes in the populations' level of housing, then the process is failing a key Priority Reform of CtG. Data is not "more accessible or usable".

Secondly, under Area 2 Building the community-controlled sector, there is a lack of transparency in data reporting that relates to unmet housing need, the reasons for why there are over-tenanted (not overcrowded in the lived experience understanding) and what real impact the build program is having, are all barriers to Aboriginal communities being in a fully informed position to take up community control. This undermines the readiness of the jurisdiction to support transfers of properties to community-control and sector development.

It is outside of the scope of this paper to comment directly on how the JSC-RHNT's work on Target 9a is, or is failing to embody the other two priority areas: Priority Reform 1 - Formal partnerships and shared decision-making and Priority Reform 3 - Transforming government organisations other than to suggest that there is scope for changes in how both of these are operationalised through the reforms we have suggested. These matters will be taken up in the two-year review of the Partnership Agreement Joint Steering Committee for Remote Housing NT currently underway.

Yours sincerely,

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