



Submission to the Senate Community Affairs Committee

**Stronger Futures in the Northern
Territory Bill 2011 and two related
bills**

1. Introduction

1. Oxfam welcomes the Government's intention to continue to allocate resources to address Indigenous disadvantage in communities in the Northern Territory beyond the expiry of the majority of Northern Territory Emergency Response (NTER) measures in July 2012.¹
2. We reiterate our agreement with the assessment made by United Nations Special Rapporteur (UNSR) James Anaya on the situation of human rights and fundamental freedoms of indigenous people:

“affirmative measures by the Government to address the extreme disadvantage faced by indigenous peoples and issues of safety for children and women are not only justified, but they are in fact required under Australia's international human rights obligations. However, any such measure must be devised and carried out with due regard of the rights of indigenous peoples to self-determination and to be free from racial discrimination and indignity. In this connection, any special measure that infringes on the basic rights of indigenous peoples must be narrowly tailored, proportional, and necessary to achieve the legitimate objectives being pursued.”

3. The Stronger Futures in the Northern Territory Bill 2011, the Stronger Futures in the Northern Territory Bill 2011 (Consequential and Transitional Provisions) and the Social Security Legislation Amendment Bill 2011 (Stronger Futures Bills) were introduced into Parliament on 23 November 2011. The Stronger Futures Bills represent a modification of initiatives introduced in the NTER.
4. The Stronger Future Bills were referred to the Senate Community Affairs Legislation Committee (Committee) on 25 November 2011. The Bills contain provisions in relation to income management, school attendance plans, alcohol abuse measures, land reform, food security as well as measures proposed for the transition from Northern Territory Emergency Response measures to Stronger Futures measures.
5. Oxfam is concerned that the development of the Stronger Futures Bills, and the proposed measures contained within them, do not adequately recognise critical rights to self-determination, participation in decision-making, and free, prior and informed consent and non-discrimination.
6. Oxfam believes that Aboriginal and Torres Strait Islander peoples must be actively involved in all aspects of the policy process – development, implementation, monitoring, evaluation and review. The Stronger Futures Bills do not ensure this involvement and the right to participate. Article 18 of the *UN Declaration on the Rights of Indigenous Peoples (Declaration)* states that,

Indigenous peoples have the right to participate in decision-making in matters which would affect their rights, through representatives chosen by themselves in accordance with their own procedures, as well as to maintain and develop their own indigenous decision making institutions.

¹Northern Territory National Emergency Response Act 2007 (Cth), s 6.

7. We believe that a shift in the government mindset in relation to addressing Aboriginal and Torres Strait Islander disadvantage is required. Government should take steps to ensure that all introduced measures in relation to Aboriginal and Torres Strait Islander peoples adhere to, and progress the implementation of the *Declaration*.
8. This submission focuses on aspects of the Stronger Futures Bills that do not adequately consider the rights of Aboriginal and Torres Strait Islander peoples and recommends steps government should take to move towards effective, rights based, community development.
9. The submission is not intended to comprehensively address all of the measures contained in the Stronger Futures Bills. Nor does Oxfam represent the views of Aboriginal people of the Northern Territory in this submission. The submission makes a series of recommendations linked to Oxfam's broader experience. It draws on the following to do so:
 - The *United Nations Declaration on the Rights of Indigenous Peoples* which was adopted by the General Assembly of the United Nations on Thursday 13 September 2007 and subsequently supported by the Australian Government 3rd April 2009
 - Report by the Special Rapporteur on the situation of human rights and fundamental freedoms of indigenous people, James Anaya Situation of indigenous peoples in Australia, Report to the General Assembly June 2010
 - Aboriginal and Torres Strait Islander Social Justice Commissioner's Social Justice Reports
 - The Australian Human Rights Commission *Suspension and reinstatement of the RDA and special measures in the NTER 2011*
 - Relevant aspects of Oxfam Australia's work in Indigenous Australia for more than thirty years and our experience in community development around the world

Section two includes recommendations for consideration by the Committee, section three briefly outlines Oxfam's role in Indigenous affairs in Australia, section four draws on our experience to suggest ways in which government can move towards a rights based community development approach, and section five discusses specific aspects of the proposed Stronger Futures Bills.

2. Recommendations

Recommendation 1: Oxfam recommends that Government ensure the Stronger Futures Bills adhere to rights as set out in the *Declaration* including the right to participate; free, prior and informed consent; and self determination.

Recommendation 2: Oxfam recommends that Government build a comprehensive framework to improve the well-being of Aboriginal and Torres Strait Islander communities by taking concrete steps towards rights based community development approaches. This should include government:

- taking steps to build its understanding of, and implement, a rights based approach
- building its cultural competency
- building its capacity to engage effectively

- building its understanding of, and implement, community development approaches

Recommendation 3: Oxfam recommends that Government develop an inclusive monitoring, evaluation and learning process for the implementation of the Stronger Futures Bills which allows for:

- the effective and meaningful engagement of Aboriginal communities and their representatives,
- produces disaggregated information and evidence which allows for differences in impacts between different groups and communities to be properly captured
- provides dynamic and real-time feedback.

Recommendation 4: Oxfam recommends that community wide income management measures are only implemented with free, prior and informed consent from communities, with particular attention paid to the views of women community members. Individual income management should arise from an independent, objective assessment process, be time bound and proportionate.

Recommendation 5: Oxfam recommends that meaningful community engagement is carried out in all communities prior to the introduction of Stronger Futures Bills income management measures to gain communities free, prior and informed consent.

Recommendation 6: Oxfam recommends that should the Stronger Futures Bills income measures be introduced, participants must have recourse to natural justice, appropriate merits review and due process.

Recommendation 7: Oxfam recommends that Government include a 'notwithstanding clause' in order to specify that the RDA is intended to prevail over the Stronger Futures Bills.

Recommendation 8: Oxfam recommends that measures to address school attendance should be developed and implemented based on meaningful, ongoing engagement with the communities affected, robust evidence, and a holistic address to the range of issues impacting on school attendance such as transport issues, schooling languages, cultural obligations and issues, health problems, and clan violence and conflict.

Recommendation 9: Oxfam recommends that government engages with communities to develop and implement solutions to address the social and economic development of remote Indigenous communities including considering issues of remoteness, education, health, job readiness, poor infrastructure and respect for Aboriginal and Torres Strait Islander form of land ownership.

Recommendation 10: Oxfam recommends that government ensures meaningful consultation and engagement occurs prior to determinations being made to change store licensing arrangements in a community.

Recommendation 11: Oxfam recommends that government develop integrated initiatives that tackle food security from a systems approach and address issues such as access, affordability, transport and nutrition.

3. Oxfam's role in Indigenous affairs in Australia

10. Oxfam Australia is an independent, not-for-profit, secular international development agency. We are a member of Oxfam International, a global confederation of 14 Oxfam affiliates that work together to fight poverty and injustice in more than 100 countries around the world. We have worked with local communities around the world to combat poverty and injustice for over 50 years.
11. Our organisation undertakes long-term development projects, provides emergency response during disaster and conflict, and conducts campaigning and advocacy for policy and practice changes which promote human rights and justice. We support over 400 long-term development projects in 30 countries across Africa, Asia, the Pacific and Indigenous Australia.
12. Oxfam Australia has supported opportunities for Aboriginal and Torres Strait Islander peoples to exercise their rights to basic social services, sustainable livelihoods, a strong voice and cultural diversity, for more than 30 years.
13. Our work with Aboriginal and Torres Strait Islander peoples involves national work through our initiatives to support the Close the Gap Campaign and moves towards constitutional recognition of Aboriginal and Torres Strait Islander people. We also support partners to undertake work related to health and wellbeing, working with Aboriginal and Torres Strait Islander young people and programs that support the right of Aboriginal and Torres Strait Islander people to self-determination.

3. Effective community development

14. Oxfam has long called for government to move more towards an effective community development approaches to address Aboriginal and Torres Strait Islander disadvantage.
15. We believe that an effective community development approach must be a rights-based approach (RBA) as this is the most effective means of addressing disadvantage and sustaining positive social and economic changes over time.
16. Article 23 of the *United Nations Declaration on the Rights of Indigenous Peoples (Declaration)*, which is supported by the Australian Government, states that,

Indigenous peoples have the right to determine and develop priorities and strategies for exercising their right to development. In particular, indigenous peoples have the right to be actively involved in developing and determining health, housing and other economic and social programmes affecting them and, as far as possible, to administer such programmes through their own institutions.²
17. We believe a shift in the government mindset in relation to addressing Aboriginal and Torres Strait Islander disadvantage is required. Steps to ensure that introduced measures adhere to, and progress the implementation of, the *Declaration* must be taken by government.
18. The human rights obligations of governments include the duty to protect against the violation of rights by others, which includes taking action to ensure the safety, security, access to adequate food and other fundamental human rights of women, men and children where

² United Nations, *United Nations Declaration on the Rights of Indigenous Peoples*, http://www.un.org/esa/socdev/unpfii/documents/DRIPS_en.pdf

these rights are being denied by the actions of other members of a community. However, governments must develop appropriate actions to avoid further undermining human rights. This would be consistent with and RBA. It is the responsibility of government to intervene to protect the security of any individual in a community whose rights to safety, freedom from violence or food security are being threatened by the actions of another community member or members, through sanction on those persons. But in doing so, such interventions should not infringe the rights of other community members.

19. The RBA focuses on the full achievement of the rights of human beings and looks at the drivers of inequality, poverty and conflict, rather than focusing on an immediate needs analysis alone. Oxfam's experience is that RBA has the potential to have a far greater impact within various levels of society because it uncovers and proposes solutions to multi-levelled barriers.
20. Significantly, rights-based approaches are no less 'practical' than other approaches and they look holistically at both rights and responsibilities.

"RBA programs emphasise not only needs and rights, but also responsibilities, in particular the government's legal obligations to promote and protect people's rights. RBA projects also build the capacity of rights bearers, so that they can insist on their rights and on government accountability".³

21. We believe government must move away from programmatic one-size-fits-all top-heavy approaches, towards rights based community development approaches. It must move towards a comprehensive framework to improve the well-being of Aboriginal communities and RBA provides such a framework.
22. We agree with the observation by the Special Rapporteur (UNSR) James Anaya on the situation of human rights and fundamental freedoms of indigenous people that,

...there is a need to incorporate into government programmes a more integrated approach to addressing indigenous disadvantage across the country, one that not just promotes social and economic well-being of indigenous peoples, but also advances their self-determination and strengthens their cultural bonds. The Government should seek to include in its initiatives the goal of advancing indigenous self-determination, in particular by encouraging indigenous self-governance at the local level, ensuring indigenous participation in the design, delivery and monitoring of programmes and promoting culturally appropriate programmes that incorporate or build on indigenous peoples' own initiatives.

23. To achieve these changes government must build its understanding of what a rights based approach entails, build its cultural competency, and build its understanding of community development approaches.
24. Starting from a rights perspective in community development would mean moving away from programmatic one-size-fits-all top-down approaches and ensuring meaningful engagement and participation in all aspects of the policy and program cycle. Cultural competence is central to this approach. As noted by the Aboriginal and Torres Strait Islander Social Justice Commissioner in his 2011 Social Justice Report, cultural competency

...does not occur just in the parts of an organisation responsible for Aboriginal and Torres Strait Islander policy and service delivery. Creating true cultural competency is an

³Rights-based Approaches learning project, CARE and Oxfam America, 2007.

organisation-wide process. In regard to government service delivery, this requires building the capacity of all those involved in policy formation and implementation: from the Minister, through to policy makers right down to the on-the-ground staff who implement the policy.

25. In practical terms, we believe that a rights based community development approach would involve taking steps to ensure:

- Negotiations with the local community on the design, implementation and monitoring of the program take place
- The program design and implementation focuses on the rights of community members including gender justice
- There is agreement from the relevant local Aboriginal or Torres Strait Islander communities and organisations to proposed measures
- There is an explicit strategy for transition from proposed measures that involves capacity building to build community ownership of initiatives
- The funding involves a long timeframe that supports long term community development approaches
- The program design, implementation, monitoring and reporting is emergent rather than pre-determined, overly bureaucratic and linear
- The approach sought to enable people to become empowered to hold each other, government, NGOs, and service providers to account. Community monitoring and feeding experience on the ground back into policy making and advocacy would form a part of this.

26. Few of these steps have been taken in the Northern Territory Emergency Response (NTER), and we remain concerned that they are not evident in the Stronger Future Bills. Taking these steps would give effect to the government desire to move from 'crisis' management of the NTER to 'normalisation'.

27. Our experience confirms that effective community development relies on the key principles of participation, transparency, collaboration and coordination, monitoring and evaluation, respect for human rights and establishment of mechanisms for review. Participation, beyond consultation and information sharing, on a community by community basis will be most effective in bringing about sustainable changes.

28. We remain concerned that communities that have been the subject of the NTER and will be focus of the Stronger Futures Bills have not had the opportunity to participate fully in decisions made about their lives and communities. Communication regarding the impact of NTER measures, that is critical to communities better understanding the options for change and ensuring their active participation in shaping decisions about future measures, has been inadequate.

29. Of particular concern is that the consultation process undertaken in relation to the Stronger Futures Bills in July and August 2011 appears to have been undertaken with inadequate lead-time and was limited in scope. The *Stronger Futures in the Northern Territory* discussion paper (Discussion Paper) was launched on 22 June 2011 with the first consultation meeting held around one week later – not allowing adequate time for community members to engage with, understand, and discuss the issues canvassed. For example, of the eight priority areas included in the Discussion paper, income management was not included, whereas the

proposed Social Security Amendment Bill alters the operation or income management, expanding it to five new sites. Further, despite being identified as 'priority areas' in the Discussion Paper, governance, housing, employment, health do not feature in the Stronger Futures Bills.

30. While noting that there appeared to be an attempt by government to better engage with affected communities regarding the Stronger Futures Bills, we believe that government needs to build its capacity to engage effectively with Aboriginal and Torres Strait Islander peoples. As reported in the 2011 Social Justice Report of the Aboriginal and Torres Strait Islander Commissioner, Toni Bauman notes in relation to Aboriginal and Torres Strait Islander peoples that,

The incapacity of governments to engage with Indigenous communities and arrive at meaningful, sustainable and owned outcomes through highly specialised skilled facilitation and participatory community development processes has troubled me for many years. The modus operandi of 'consultation' has mostly been one-way communication in 'meetings' in which talking heads drone on, poorly explaining complex information and concluding by asking: 'Everyone agree?'. The response: hands raised half-heartedly and barely perceptible nods. Outside the meeting, participants typically have little or no understanding of what they have agreed to, the possible repercussions of agreement, or the short-, medium and long-term resources available for implementation requirements.⁴

31. International experience is increasingly demonstrating that the provision of timely comparative information regarding the impact of measures, and real participation in monitoring, can become a key driver of more efficient and effective services, as well as ensure rights to participation are recognised.
32. International experience would suggest that a number of important principles would inform the development of an effective monitoring and evaluation process for ensuring programs have the intended outcomes and operate within a rights based framework. Amongst the most important of these would be:
- robust engagement of indigenous communities throughout the process so that they have an effective voice in assessing outcomes and process
 - allowing for disaggregated information and evidence to be collected which allow for differences in outcomes between groups to be properly captured and represented
 - building a program logic map which clearly links what Government is trying to achieve overall with how this will be done
 - the need for the process and findings to be transparent, and easily communicated
 - creating a system which provides 'real-time' feedback where appropriate.
33. International experience around social accountability, which refers to a broad range of actions that citizens can use to hold governments, NGOs and others accountable, have proved to be particularly effective in improving governance, increasing development effectiveness, and in empowering communities. The monitoring and evaluation framework needs to explore how best such mechanisms might be integrated to ensure intended outcomes are met.

⁴T Bauman, "You Mob All Agree?" The Chronic Emergency of Culturally Competent Engaged Indigenous Problem Solving' (2007) 6(29) *Indigenous Law Bulletin* 13, p 13.

34. Monitoring, evaluation and learning is an important part of any program cycle and evidence suggests that, if done well, it can improve governance, increase development effectiveness, and empower communities.
35. Oxfam recommends that Government ensure the Stronger Futures Bills adhere to rights as set out in the *Declaration* including the right to participate; free, prior and informed consent; and self determination **[Recommendation 1]**.
36. Oxfam recommends that Government build a comprehensive framework to improve the well-being of Aboriginal and Torres Strait Islander communities by taking concrete steps towards rights based community development approaches. This should include government:
- taking steps to build its understanding of, and implement, a rights based approach
 - building its cultural competency
 - building its capacity to engage effectively
 - build its understanding of, and implement, community development approaches **[Recommendation 2]**
37. Oxfam recommends that Government develop an inclusive monitoring, evaluation and learning process for the implementation of the Stronger Futures Bills which allows for:
- the effective and meaningful engagement of Aboriginal communities and their representatives,
 - produces disaggregated information and evidence which allows for differences in impacts between different groups and communities to be properly captured
 - provides dynamic and real-time feedback **[Recommendation 3]**.

3. Specific measures included in the Stronger Futures Bills

Income management

38. The Social Security Bill proposes measures relating to the operation of income management, to expand its operation to five new sites, and allows for income management to be 'triggered' through referrals from State and Territory agencies.⁵
39. Community wide income management measures should only be implemented with free, prior and informed consent from communities, with particular attention paid to the views of women community members. Individual income management should arise from an independent, objective assessment process, be time bound and proportionate.
40. As noted above, we are concerned that the consultation process for the Stronger Futures Bills was inadequate, and note again that income management measures were not included as issues for consideration. We have found no evidence of any consultation on this issue with communities in the five new regions to which income management will be extended.
41. Oxfam believes that meaningful community engagement to seek free, prior and informed consent must be carried out in all communities that will subject to Stronger Futures Bills measures.

⁵Parliament of Australia, House of Representatives, Social Security Amendment Bill 2011

42. Should Stronger Futures Bills income management measures be introduced, Oxfam believes that it is critical that they afford participants their rights to natural justice through appropriate merits review and due process.
43. While steps have been taken through a more general application and extension to limit the discriminatory nature of income management, Oxfam remains concerned that there is a high representation of Aboriginal people in the Northern Territory that will be affected by the regime. The disproportionate effect on Aboriginal people raises concerns about the measures being indirectly discriminatory.
44. The inclusion of a 'notwithstanding clause' as previously recommended by Oxfam in our submission to the Senate Community Affairs Committee in relation to the NTER⁶, would put beyond doubt that the Stronger Futures Bills measures are subject to the Racial Discrimination Act 1975 (RDA). This would be consistent with the Government stated intent that measures are consistent with the RDA.
45. Oxfam recommends that community wide income management measures are only implemented with free, prior and informed consent from communities, with particular attention paid to the views of women community members. Individual income management should arise from an independent, objective assessment process, be time bound and proportionate **[Recommendation 4]**.
46. Oxfam recommends that meaningful community engagement is carried out in all communities prior to the introduction of Stronger Futures Bills income management measures to gain communities free, prior and informed consent **[Recommendation 5]**.
47. Oxfam recommends that should the Stronger Futures Bills income measures be introduced participants must have recourse to natural justice, appropriate merits review and due process **[Recommendation 6]**.
48. Oxfam recommends that Government include a 'notwithstanding clause' in order to specify that the RDA is intended to prevail over the Stronger Futures Bills **[Recommendation 7]**.

School attendance plans

49. The Social Security Bill amends social security law related to the Improving School Enrolment and Attendance through Welfare Reform Measure (SEAM) policy. The amendments propose that parents can be required to participate in a compulsory conference regarding their child's attendance at school, to agree to a school attendance plan, and to comply with the plan. Suspension of a parent's income support payment can occur if a parent does not comply with these measures.⁷
50. Oxfam believes every child has the right to an education, and believes that appropriate and accessible education is critical in addressing disadvantage. SEAM does not address either access or appropriateness of education despite the fact that the SEAM Evaluation Report found that attendance was influenced by a number of issues such as transport issues, schooling languages, cultural obligations and issues, health problems, and clan violence and conflict.⁸

⁶ Oxfam Australia, Submission to the Senate Community Affairs Committee Inquiry into Welfare Reform and Reinstatement of Racial Discrimination Act Bill 2009 and other Bills

⁷ Parliament of Australia, House of Representatives, Social Security Amendment Bill 2011

⁸ Department of Employment and Workplace Relations, *Improving School Enrolment and Attendance through Welfare Reform Measure (SEAM): Evaluation Report for the Northern Territory in 2009 with early findings for 2010* (2011), p 28.

51. Oxfam notes that a new evaluation of the SEAM trial is due imminently but is concerned that at the time of writing there appears to be little evidence to indicate that SEAM is an effective approach to addressing the low school attendance levels of Aboriginal children in the Northern Territory. Instead a recent evaluation found no change to 'unauthorised absenteeism' between 2007 and 2009.⁹
52. This stands in contrast to advice given in the Stronger Futures Discussion Paper that SEAM is 'having a positive impact on parents ensuring their children are enrolled and regularly attending school'.¹⁰
53. Oxfam is therefore concerned that little evidence appears to exist to warrant the SEAM measures in the Stronger Futures Bills and that meaningful engagement with communities with regard to those measures has not occurred.
54. Oxfam recommends that measures to address school attendance should be developed and implemented based on meaningful ongoing engagement with the communities affected, robust evidence, and a holistic address to the range of issues impacting on school attendance such as transport issues, schooling languages, cultural obligations and issues, health problems, and clan violence and conflict [**Recommendation 8**].

Land reform measure

55. The Stronger Futures Bill empowers the Commonwealth to make amendments to Northern Territory legislation with regard to community living areas and town camps in order to enable voluntary long term leasing with the granting of individual rights and interests such as private home ownership, and business activity in community living areas.¹¹
56. Oxfam agrees with the Special Rapporteur (UNSR) James Anaya on the situation of human rights and fundamental freedoms of indigenous people that, increasing indigenous peoples' control over their lands and resources, self-determination and self-government is an essential component of advancing economic development'.¹²
57. Oxfam therefore believe that measures designed to facilitate positive social and economic development in Aboriginal communities should also ensure that the right to self determination is protected.
58. Such measures must be developed and implemented with meaningful participation of Aboriginal and Torres Strait Islander people and communities and must be consistent with the *Declaration*.
59. Oxfam recommends that government engages with communities to develop and implement solutions to address the social and economic development of remote Indigenous communities including considering issues of remoteness, education, health, job readiness, poor infrastructure and respect for Aboriginal and Torres Strait Islander form of land ownership [**Recommendation 9**].

Food security measure

⁹ Department of Employment and Workplace Relations, *Improving School Enrolment and Attendance through Welfare Reform Measure (SEAM): Evaluation Report for the Northern Territory in 2009 with early findings for 2010* (2011), p 25.

¹⁰ Australian Government, *Stronger Futures in the Northern Territory Discussion paper* (2011), p 10. At <http://www.indigenous.gov.au/stronger-futures-in-the-northern-territory/> (viewed 25 January 2012).

¹¹ Parliament of Australia, House of Representatives, *Stronger Futures in the Northern Territory Bill 2011*

¹² J Anaya, Report on the Situation of indigenous peoples in Australia, note 4, para 74.

60. This measure enables 'special measures' to be taken in relation to licencing of community stores where they are an important source of food, drink or grocery items for an Aboriginal community. These will include transitioning existing licences, considering whether further stores will be required to be licenced, and new penalties for breaches of a licence or failure to become licenced.
61. Oxfam believes accessible, affordable and nutritious food is critical to addressing Aboriginal and Torres Strait Islander health and wellbeing.
62. Oxfam welcomes measures designed to regulate community stores with a view to increasing the supply of nutritious food to community members and encouraging the consumption of such foods.
63. However, community circumstances vary from community to community and the views of those to be affected by measures must be taken into account. Proposed measures should therefore ensure that meaningful consultation and engagement with each community occurs prior to determinations being made to change a community stores licencing arrangement.
64. Oxfam believes that licencing of community stores to ensure 'satisfactory range of healthy and good quality food, drink or grocery items'¹³ is one component of food security in remote communities.
65. We believe the most effective strategies are cross-sectoral and integrated initiatives that tackle food security from a systems approach and address access, affordability, transport and nutrition. This has been recognised in the COAG National Strategy for Food Security in Remote Indigenous Communities (COAG Food Security Strategy), which states
- Improving food security and turning around the long-standing poor health outcomes for Indigenous people in remote Indigenous communities will require a multi-faceted and coordinated ongoing approach from all levels of government, Indigenous people and the non-government and private sectors to develop and implement effective and targeted actions.
66. Oxfam believes that issues such as transport costs and affordability are also critical aspects of food access and influence the capacity of community stores to supply healthy foods at reasonable costs as well as the end price and viability of them being purchased by community members.
67. We note the National 'Healthy Eating Action Plan' for remote Indigenous communities included in the COAG Food Security Strategy, but believe that government action in this area is somewhat limited and does not otherwise represent indicate a 'multi-faceted and coordinated approach.'
68. Oxfam recommends that government ensures meaningful consultation and engagement occurs prior to determinations being made to change store licencing arrangements in a community **[Recommendation 10]**.
69. Oxfam recommends that government develop integrated initiatives that tackle food security from a systems approach and address issues such as access, affordability, transport and nutrition **[Recommendation 11]**.

¹³ Stronger Futures in the Northern Territory Bill 2011 (Cth).