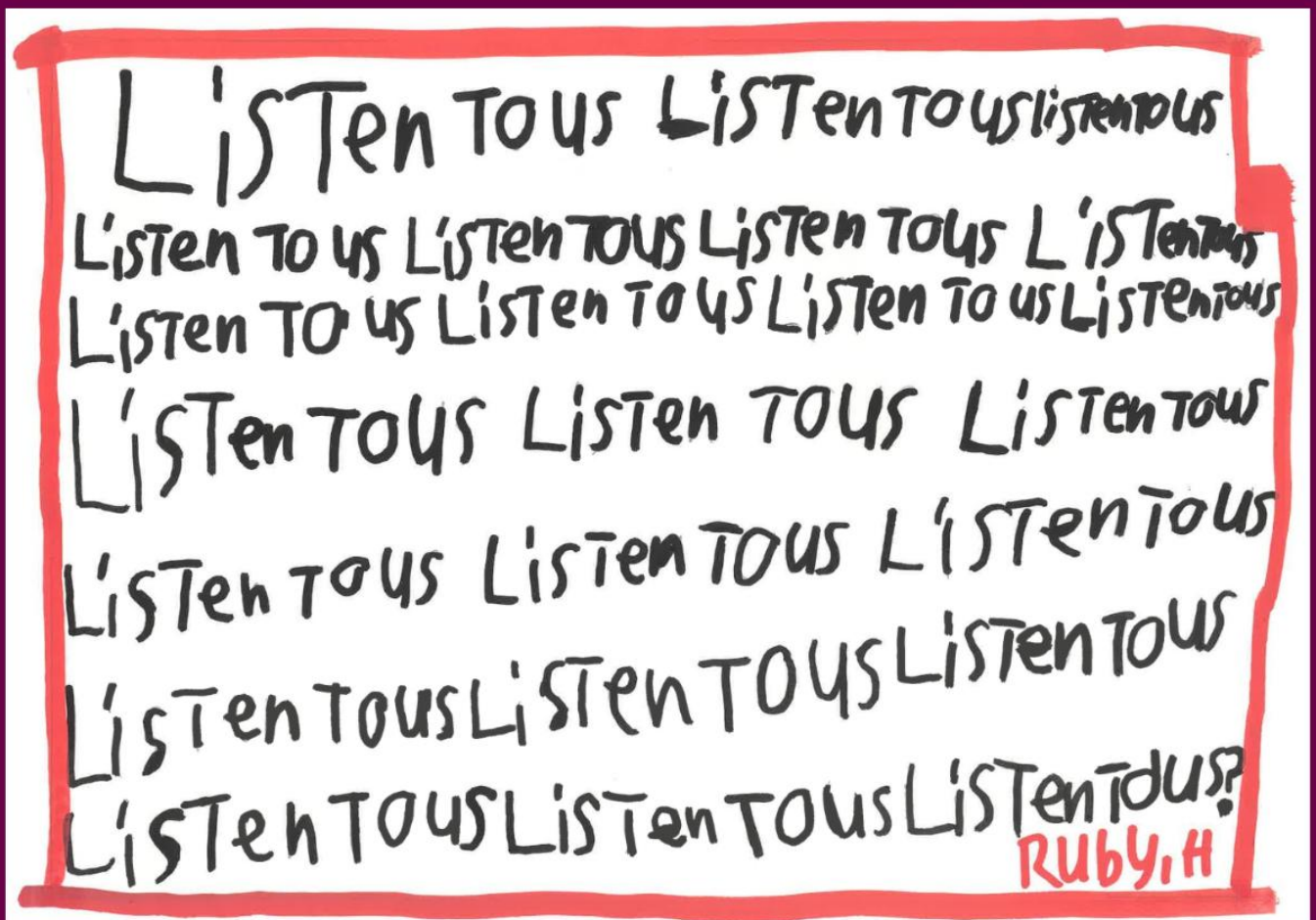




Queensland Independent
Disability Advocacy Network

Analysis of the Implementation of the Disability Royal Commission



About the Queensland Independent Disability Advocacy Network

The Queensland Independent Disability Advocacy Network (**QIDAN**) is a group of organisations providing individual advocacy services to Queenslanders living with disability. These organisations are funded under the Queensland Disability Advocacy Program (**QDAP**). The member organisations include Aged and Disability Advocacy; AMPARO Advocacy Inc; Capricorn Citizen Advocacy; Mackay Advocacy Inc; People with Disability Australia; Queensland Advocacy for Inclusion (**QAI**); Rights in Action; Yarn2Action run by Aged and Disability Advocacy; Speaking Up For You; and TASC.

QIDAN has three aims:

- Systemic advocacy: coordinated action to address systemic issues experienced by people with disability,
- Member support: a collaborative space for the exchange of information, resources and issues affecting disability advocacy organisations, and
- Sector advocacy: to promote the importance and value of independent disability advocacy on a local, state, and national basis.

The members of QIDAN offer various independent disability advocacy services across Queensland, including general disability advocacy, specialised individual advocacy (including National Disability Insurance Scheme appeals), citizen advocacy and systemic advocacy. QAI coordinates the Disability Advocacy Pathways Hotline ('Pathways') to provide information and referrals to people with disability, their families and supporters.

About the cover artwork

QAI commissioned award-winning artist with disability, [Ruby Herrenberg](#), to create an artwork to raise awareness with politicians on the issues people with disability face. We love that she has used a phrase many people with disability tell us is one of the most fundamental human rights, to be heard. This phrase is particularly relevant in the context of this report, being the lack of implementation of the recommendations that came from thousands sharing their stories with the Disability Royal Commission.

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Background

In response to the lack of transparent and meaningful updates on the implementation of the Disability Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability (**DRC**), QIDAN initiated an independent, self-led analysis of the progress of each DRC recommendation. What started as a review of publicly available information quickly became something much larger, and our findings from the analysis changed the way we think about the governments' commitment to Queenslanders with disability. We decided to turn our analysis into the following report, because we believe that our findings belong to the public. QIDAN have two main intentions for this report:

1. We want it to be a tool everyone can use to independently track the implementation of the DRC recommendations, and to keep up to date with what governments have said and/or done in relation to the recommendations.
2. We want to keep governments accountable.

Since the DRC was first established in 2019, it has had a significant impact on Australia's disability community. The consultation and evidence gathering process involved nearly 10,000 people with disability, their families and their carers, who shared stories of maltreatment, discrimination, and oppression. The incredible strength of those who contributed to the DRC helped to inform 222 recommendations issued by the DRC in its final report in September 2023. All recommendations were made with the intent of reducing and eliminating the risk of maltreatment, discrimination and exclusion experienced by people with disability, and to reach the realisation of equitable rights and genuine inclusion.

Despite the DRC final report being published over two years ago, there has been very little progress in the implementation of the recommendations. In fact, QIDAN discovers in this report that **only 3% of recommendations have been genuinely implemented**, and 53% of recommendations have no progress we can report on. The lack of action taken by federal and state and territory governments to implement the DRC has significantly impacted the people who shared their experiences with the Commission, and has eroded public confidence that governments are committed to a truly inclusive Australia.

In July 2024, the Australian and Queensland governments released reports detailing their responses to each recommendation made by the DRC, advising whether each recommendation was:

- Accepted
- Accepted in principle
- Subjected to further information
- Noted
- Rejected

QIDAN analysed the reports and noted many of the governments' responses to recommendations were sometimes misleading and did not adequately address the actual intent of the DRC, nor provide strong or clear commitment to the changes the DRC proposed. More information on QIDAN's findings can be found in [QIDAN's Position Paper on the Government Responses to the DRC](#).

Timeline – from the final report to the present

In September 2024, the Disability Reform Ministerial Council (**DRMC**) released a [Disability Reform Roadmap for 2024 and 2025](#) (the **Roadmap**), which provided a brief overview and timeline of the key deliverables for major disability reform pieces, including the DRC, National Disability Insurance Scheme (**NDIS**) reform, Foundational Supports, and Australia's Disability Strategy (**ADS**). The Roadmap clearly stated:

- an interim joint progress update on the DRC was due in December 2024
- the first national implementation progress report was due in June 2025, and
- the second progress report is due in December 2025¹.

It is important to note the first national implementation progress report was only published in late November 2025.

After the Roadmap was published, the Queensland Government committed over \$160 million to disability reform in the Queensland 2024-25 Budget, including investment for the co-designed implementation of the DRC.

In December 2024, the Australian, state and territory governments published a report titled the [National Interim Update 2024](#). The stated intention of this short report was to provide a “snapshot” of the work governments are doing on certain recommendations². However, as we

will discuss throughout our report, the activities described in the National Interim Update 2024 report do not adequately meet the intention of the recommendations made by the DRC. The report also reiterated “All governments have agreed that biannual reporting arrangements will commence from June 2025”³.

Following the National Interim Update 2024 report, there was very little communication from the governments about the DRC for most of 2025. The first meaningful update on the DRC was mentioned in the [DRMC Communiqué](#) dated 6 June 2025, which stated Ministers “reiterated their commitment to the implementation of the joint government’s response to the Disability Royal Commission recommendation as a priority for the DRMC and agreed to endorse the Biannual report out of session by the end of August 2025”⁴. QIDAN believe this is a reference to the first national implementation progress report. This report was not released in August. Then, on the 30th of July 2025, an updated [Disability reform roadmap](#) was published.

In October 2025, QIDAN reached out to Queensland’s Minister for Disability to ask when the report will be published, and the response received from the Minister offered no information on its status nor due date.

Finally, on 27 November 2025, governments released the [Disability Royal Commission Progress Report 2025](#) , providing federal and state-based updates on each recommendation⁵. Upon review of this report, QIDAN was disappointed by its lack of genuine updates, especially from the Queensland Government.

Alongside the DRC Progress Report 2025, The Queensland Government released a new and updated version of the [Queensland Government Response to the DRC](#), changing the Queensland Government’s position on several recommendations⁶. In fact, the Queensland Government reduced their commitment for two recommendations, and altered their supporting commentary for 37 other recommendations. Some of the changes that concern QIDAN include:

- Recommendation 4.30 (b) regarding vilification because of disability, which was originally accepted in principle but subsequently changed to subjected to further consideration.
- Recommendation 8.16 regarding enabling First Nations organisations to support First Nations peoples with disability in custody, where the Queensland Government originally stated in their response that they accepted the recommendation “to ensure

First Nation peoples in custody or under supervision are managed in a culturally sensitive and culturally safe manner"⁷. The response was then altered to remove this sentence⁸.

- Recommendation 9.1 regarding culturally appropriate parenting capacity assessments, which was originally accepted in full by the Queensland Government but subsequently changed to accepted in principle.⁹

It is crucial to note QIDAN could not find any press from the Queensland Government prior to releasing the updated version of its response to the DRC, and the changes made in the new response paper are not clearly identified within the new response document. Though QIDAN do note that the DRC Progress Report 2025 contains several statements about the updated Queensland response, the statements are scattered, inconsistent, and are not made on every relevant recommendation. This means that QIDAN only learned of all the content changed by the current Queensland Government by performing a side-by-side comparison of the original and updated response reports. Covertly changing and downgrading commitments to certain recommendations sets a dangerous precedent, and QIDAN will monitor any future updates made by the Queensland Government.

QIDAN's ongoing commitment to the Disability Royal Commission

QIDAN intend for this analysis to be an annual exercise, and we hope to publish this type of report annually to keep our communities up to date. For this analysis report, QIDAN used information that is publicly available. In many cases, this meant reviewing media statements, articles, reviews of policies and strategies, announcements of reviews into policies and strategies, amendments to legislation, information on consultations, and information from government websites. We use the following terms to indicate how far each recommendation is in the implementation process:

- **Rejected:** The government/s responsible for implementing this recommendation has shown they have no intent to implement it.
- **No Update:** The government/s responsible have either made no public comment regarding implementation of the recommendation, have made no clear attempt at implementation, or the attempt has been cited by the government/s for the recommendation does not actually align with the recommendation.

- **Beginning stages:** The government/s responsible have started a review, plan or program that will inform the future implementation of the recommendation, but no further work has occurred.
- **In progress:** The government/s responsible have implemented a review, plan or program aligning with the recommendation. The government/s may also have started pilot projects or other initial steps that will likely lead to full implementation in the future.
- **Implemented:** The government/s responsible have implemented the recommendation in line with the DRC's intention.

The process of analysing the implementation of the DRC recommendations was challenging and time-consuming. For QIDAN, it put into perspective how difficult it would be for the every-day person to try to keep up to date with the DRC. Often, the updates we discovered were not directly attributed to the DRC, meaning QIDAN had to use discretion to decide whether an action taken by government or other body truly reflected the intent of a DRC recommendation. Because our analysis is based on what is publicly available, and our own discretion, it may not reflect the most recent developments. In an effort to ensure we present accurate information sections of this analysis were provided to relevant Government Departments and agencies prior to release to offer an opportunity for feedback on any publicly available information we may have missed or misrepresented.

QIDAN is committed to promoting and defending the rights of people with disability, and we are hopeful the implementation of the DRC will eliminate the conditions leading to Australians with disability being targeted by violence, abuse, neglect and exploitation. The disability community deserve to play an active role in the disability reform, and QIDAN strives to ensure the DRC is not forgotten.

Volume 4: Realising the human rights of people with disability

Volume 4 calls for legislative reform with the aim to better promote and protect disability rights and human rights. The recommendations in this volume focus on the development of a Disability Rights Act, and the need to review and amend the Disability Discrimination Act. It also looks at the limited implementation of the [Convention of the Rights of Persons with Disabilities \(CRPD\)](#) in Australia. This year marks the twentieth anniversary of the

establishment of the CRPD, which means that Australia has failed to fully implement the Convention for two decades.

QIDAN believe the proposed reform to the Disability Discrimination Act (recommendations 4.23 to 4.34) would be more effective in their operations and applications with the introduction of a national Human Rights Act as proposed by the [Human Rights Act Campaign](#).

In July 2024, twelve disability representative organisation made a joint statement advocating for a Human Rights Act¹⁰. Additionally, the Parliamentary Joint Committee on Human Rights inquiry into Australia's human rights framework reported on 30 May 2024 that they also recommend the establishment of a Human Rights Act¹¹. The DRC was unable to consider a Human Rights Act due to their terms of reference and instead recommended the establishment of a Disability Rights Act (recommendations 4.1 to 4.22).

Recommendations 4.1 - 4.22: Disability Rights Act

Responsibility: Australian, state and territory governments

Response: Subject to further consideration

Update: No update

Recommendations 4.1 to 4.22 regard the establishment of a Disability Rights Act. The Australian Government initially subjected this recommendation to further consideration, citing the need to consider the establishment of a Disability Rights Act alongside its consideration of the [Parliamentary Joint Committee on Human Rights report \(PJCHR\)](#) regarding Australia's Human Rights Framework. Currently, the Australian Government has not taken a clear position on the PJCHR report. Furthermore, Governments have also not provided any updates on recommendations 4.1 to 4.22 and whether it supports the establishment of a Disability Rights Act.

Recommendations 4.23 - 4.34: Disability Discrimination Act

Responsibility: Australian Government

Response: Subject to further consideration

Update: Beginning stages

Recommendations 4.23 to 4.34 refer to the review and amendment of the Disability Discrimination Act. In direct response to these recommendations, the Australian Government committed \$6.9 million to the review and amendment of the Disability Discrimination Act. The Attorney-General's Department is responsible for overseeing the review and will consider how to implement the Disability Royal Commission's 15 recommendations. The Attorney-General's Department is considering the reports and submissions from the DRC in their review and have also conducted public consultations and called for submissions.

Note: The Queensland Government response to recommendation 4.30 (b) changed from accept in principle to subject to further consideration in the updated response report.

Volume 5: Governing for inclusion

Volume 5 addresses the need for greater disability leadership, governance and coordination, particularly during the disability reform. Recommendations were made to increase disability leadership with the establishment of a National Disability Commission, lived-experience ministerial positions, portfolios and departments. Recommendations also focused on improving cohesion and effectiveness throughout the Government.

Recommendation 5.1: Development of a National Disability Agreement

Responsibility: Australian, state and territory governments

Response: Subject to further consideration/accept in principle

Update: No update

Recommendation 5.1 recommended the development of a National Disability Agreement by the end of 2024. The National Disability Agreement is recommended to be established through the Disability Reform Ministerial Council, with the fundamental objective of advancing equality, inclusion and disability rights. The National Disability Agreement would also provide a framework for nationally consistent implementation of disability reform, including the DRC. The Australian Government subjected this recommendation to further consideration, stating

they would provide their response on the 31 December 2024¹². This response has not been provided.

Recommendation 5.2: Review and update of Australia's Disability Strategy

Responsibility: Australian, state and territory governments

Response: Accept

Update: In progress

Recommendation 5.2 calls for the review and update of Australia's Disability Strategy (**ADS**). A review has occurred, and an updated version of the [ADS 2024 update](#) was published in December 2024. However, the updates to the ADS does not align with the DRC. Furthermore, additional consultation with people with disability have continued into 2026 as part of an independent evaluation of the ADS. Until the ADS has been updated in line with the DRC, and consultations have been finalised, this recommendation is only in progress.

Recommendation 5.3: Review and update of Queensland's Disability Plan

Responsibility: State and territory governments

Response: Accept in principle

Update: Beginning stages

Recommendation 5.3 recommends all state and territory governments review and update disability related strategies and plans to ensure they reflect the DRC's findings. In the DRC Progress Report 2025, the Queensland Government stated it has commenced a review of the [Queensland Disability Plan 2022-2027](#), further mentioning that it will not begin a "full review and co-design process" until the Australian Disability Strategy is updated¹³. No further progress has occurred.

Recommendation 5.4: Review of national agreements strategies and plans

Responsibility: Australian, state and territory governments

Response: Accept in principle

Update: Beginning stages

Recommendation 5.4 requests that all national disability-related agreements, policies and plans be reviewed. The scope of disability-related national agreements, policies and plans is extensive, and it is difficult to track progress on the extent to which governments have

progressed this recommendation. However, there are some areas where traction can be observed, such as in the disaster and recovery space, where disability appears to be a key consideration for reviews and updates to strategies. It appears that governments are beginning to review relevant agreements through a disability lens.

Recommendation 5.5: Establishment of a National Disability Commission

Responsibility: Australian Government

Response: Subject to further consideration

Update: No updates

Recommendation 5.5 recommends the establishment of a National Disability Commission. In their initial response, the Australian Government subjected recommendation 5.5 to further consideration, stating they would consider this recommendation whilst reviewing the 2024 the [Parliamentary Joint Committee on Human Rights report](#) regarding Australia's Human Rights Framework. However, there have been no updates.

Recommendation 5.6: New governance arrangements for disability

Responsibility: Australian Government

Response: Note

Update: Rejected

Recommendation 5.6 calls for new governance arrangements for disability, including establishing a portfolio responsible for disability policies and programs, a ministerial position for disability inclusion, and the formation of a Department of Disability Equality and Inclusion. In the Australian Government's initial response, the government implied it had no intention of implementing this recommendation¹⁴. Therefore, QIDAN considers this recommendation rejected.

Recommendation 5.7: Focal points across jurisdictions to implement the CRPD

Responsibility: Australian, state and territory government

Response: Accept in principle

Update: No updates

Recommendation 5.7 recommends each jurisdiction has a dedicated focus on the implementation of the Convention of the Rights of Persons with Disabilities (**CRPD**). There are

no clear updates on whether governments are actively working toward implementing the CRPD.

Volume 6: Enabling autonomy and access

Volume 6 focuses on the promotion of access and autonomy for people with disability. Some of the specific areas highlighted in this volume include accessible information and systems, the right to decision making, access to advocacy, and bodily autonomy. The recommendations in this volume ask for legislative reviews and reforms, improvements to supported decision making, reforms to the Public Trustee, additional funding for disability advocacy, and improvements to the health system.

Note: In March 2026, The Queensland Government responded to the Inquiry into elder abuse in Queensland. Recommendation 10 of the Inquiry's report calls for reform to capacity judgement frameworks and promotion of supported-decision making, which the Queensland Government says it supports 'in principle'. The Queensland Government further stated that they will explore options to "further provide supported decision-making", including by considering relevant DRC recommendations¹⁵. Recommendations 6.4 to 6.10 concern supported-decision making and will hopefully be implemented in the near future in line with the Inquiry in elder abuse in Queensland. However, there has been limited-to-no progress on these recommendations that QIDAN can report on at this stage.

Recommendations 6.1 - 6.2: A national plan to promote accessible information and communications and increase Auslan interpreters.

Responsibility: Australian, state and territory governments

Response: Accept in principle

Update: Beginning stages

Recommendations 6.1 and 6.2 recommend the development of an 'Associated Plan' alongside the Australian Disability Strategy, with the objective of improving the accessibility of information and communication, as well as a workforce strategy, to increase Auslan interpreters. In response to these recommendations, all governments supported the development of the Associated Plan stating scoping and development will commence in 2024. According to the DRC Progress Report 2025, the development of the Associated Plan has commenced that will action both recommendations. Disappointingly, drafts have not been

shared with the community yet and governments do not expect the Associated Plan to be finalised until June 2027¹⁶.

Recommendation 6.3: Access to appropriately skilled and qualified interpreters

Responsibility: Australian Government

Response: Accept in principle

Update: Beginning stages

Recommendation 6.3 calls for improved access to appropriately skilled and qualified interpreters for people with disability, recommending that translator and interpreter accreditations include disability awareness components. Recommendation 6.3 further recommends amendments to the NDIS to include working with interpreter's standards. The Australian Government have said they are working with the National Accreditation Authority for Translators and Interpreters to develop a training package. As development of training is underway, this recommendation is in the beginning stages of implementation.

Recommendations 6.4 - 6.5: Recognition of the CRPD and amendments in guardianship and administration legislation

Responsibility: State and territory governments

Response: Accept in principle

Update: No update

Recommendations 6.4 and 6.5 ask for guardianship and administration legislation to be amended to recognise the rights of people with disability in line with the Convention on the Rights of Persons with Disabilities, and for relevant legislation to include a more empowering, progressive use of language. The Queensland Government is yet to action either of these recommendations.

Recommendation 6.6: Supported decision-making principles

Responsibility: Australian, state and territory governments

Response: Accept in principle

Update: No update

Recommendation 6.6 calls for states and territories to ensure guardianship and administration legislation include supported decision-making principles as outlined by the DRC. This

recommendation also asks states and territories to identify and reform any laws relevant to decision-making support. The Australian Government released the National Public Guardianship Principles (2025)¹⁷, which they state has been informed by recommendation 6.6. Though QIDAN see the Australian Government's progress as positive, it does not actually amend legislation as outlined in this recommendation.

Recommendations 6.7 - 6.12: Changes to guardianship and administration law and guidelines

Responsibility: State and territory governments

Response: Accept in principle

Update: No update

Recommendations 6.7 through to 6.12 discuss the need for sweeping changes to guardianship and administration legislation and guidelines, including changes to assumed decision-making ability, representation orders, representatives and supporters, guidelines on maximising participation and public disclosure and confidentiality restrictions. The Queensland Government is yet to action any of these recommendations.

Recommendation 6.13: Information and education on supported decision-making

Responsibility: State and territory governments

Response: Accept in principle

Update: Beginning stages

Recommendation 6.13 calls for states and territories to ensure public advocates and public guardians provide information, education and training on supported decision-making to people who require it. The Office of the Public Guardian (**OPG**) has held several webinars on supported decision-making and related topics, which have recorded, for the purpose of providing information and education to the public¹⁸. The OPG's efforts to provide online education and information sessions on supported decision-making demonstrate that this recommendation is in the beginning stages of implementation.

Recommendation 6.14: Systemic advocacy to promote supported decision-making

Responsibility: State and territory governments

Response: Accept in principle

Update: No update

Recommendation 6.14 asks state and territory governments to establish statutory bodies that are responsible for promoting supported decision-making within the Public Trustee. In the DRC Progress Report 2025, the Queensland Government refers to several initiatives including the Customer Advocate, Financial Independence Pathway program, advocacy referral pathways, and education initiatives¹⁹. Whilst these are positive initiatives, they do not replace the need for a new statutory body that is responsible for promoting supported decision-making. Therefore, we believe there has been no progress in implementing this recommendation.

Recommendation 6.15: Updating the national standards for public advocates, public guardians and public trustees

Responsibility: State and territory governments

Response: Accept in principle

Update: No update

Recommendation 6.15 calls for national standards for public advocates, public guardians and public trustees to be updated in alignment with recommendations 6.4 – 6.10.

Recommendation 6.15 also calls for recognition of the importance of culturally safe and responsive work. The Australian Guardianship and Administration Council updated the [National Public Guardianship Principles \(NPGP\)](#) in 2025 in line with *current* state and territory legislative requirements²⁰. As covered in recommendations 6.4 to 6.10, guardianship and administrative legislation have not been amended in line with the DRC. This means that until recommendation 6.4 to 6.10 are fully implemented, changes like those to the NPGP are not fully compatible with recommendation 6.15. We therefore consider this recommendation to be only in the beginning stages of implementation.

Recommendation 6.16: Financial skills development programs

Responsibility: State and territory governments

Response: Accept in principle

Update: No update

Recommendation 6.16 recommends public trustees offer financial skills development programs to people who are appointed public trustee representatives, whilst also offering support the person to apply for a review of their order. In the DRC Progress Report 2025, the Queensland Government states it is carefully considering this recommendation, acknowledging it calls for “significant change to ... guardianship systems and legislation”²¹. However, there is no further information on how the government intends to begin this process.

Recommendation 6.17: Transparency of public trustee fees and charges

Responsibility: State and territory governments

Response: Accept in principle

Update: No update

Recommendation 6.17 asks public trustees in each state to provide accessible and transparent information about public trustee fees and charges. It further calls for public trustees to regularly and consistently engage with people under administrative orders about their fees, and to offer information about the services they should expect to receive. The Queensland Government states in the DRC Progress Report 2025 that the Queensland Public Trustee currently publishes information on fees and charges²². However, QIDAN found that this information isn’t in accessible formats. Furthermore, there appears to be no further information about improving regular contact with people under administrative orders and improving engagement around fees and charges.

Recommendation 6.18: Review of public trustees’ fees and charges

Responsibility: State and territory governments

Response: Accepted in principle

Update: Beginning stages

Recommendation 6.18 calls for state and territory governments to facilitate the independent review of public trustee fees and charges. According to the DRC Progress Report 2025, the Queensland Public Trustee consulted with the public and a range of stakeholders about fee

reform, and the Queensland Government is currently considering new fee proposals²³. There is no further information about when the government is due to announce their decision on fee reform.

Recommendation 6.19: Data collection on support and representation arrangements

Responsibility: Australian, state and territory governments

Response: Accept in principle

Update: No update

Recommendation 6.19 focuses on the development and implementation of a national approach to collecting and publishing de-identified data on support and representation arrangements. The joint government's response to this recommendation made in 2024 advises that governments will develop an action plan alongside the Australian Disability Strategy. Though the [Data Improvement Plan 2024](#)²⁴ has been released, it does not provide any actionable steps that governments will take to collect the data as described in this recommendation. Furthermore, there appears to be no other progress made on this recommendation.

Recommendation 6.20: Australia's interpretative declaration in relation to Article 12 of the CRPD

Responsibility: Australian Government

Response: Subject to further consideration

Update: No update

Recommendation 6.20 asks the Australian Government to withdraw its interpretative declaration in relation to Article 12 of the Convention on the Rights of Persons with Disabilities (**CRPD**). The interpretative declaration means that the Australian Government supports the use of substituted decision making in addition to supported decision making. In the DRC Progress Report 2025, the Australian Government states it will "revisit" the interpretative declaration following its work on recommendation 6.6²⁵, but it provides no timeframe nor course of action.

Recommendations 6.21 - 6.23: Independent disability advocacy

Responsibility: Australian, state and territory governments

Response: Accept in principle

Update: Beginning stages

Recommendations 6.21 through to 6.23 regard improving access to independent individual disability advocacy, improve data collection, and increase the access to culturally safe disability advocacy. Recommendations 6.21 to 6.23 also call for the National Disability Advocacy Framework to be amended to include priority areas such as increasing culturally appropriate and accessible advocacy services. The Queensland Government recently provided short-term uplift funding to Queensland Disability Advocacy Program funded organisations for two consecutive years but has not continued funding for an LGBTQIASB+ pilot which would have significantly increased access to culturally safer advocacy. As the increased funding for individual advocacy has been only short-term, it does not sustainably increase access to advocacy as recommended by the DRC.

Recommendations 6.24 – 6.25: Cognitive Disability Health Capability Framework

Responsibility: Australian Government

Response: Accept in principle

Update: No update

Recommendations 6.24 and 6.25 call for the improved coordination and implementation of the Cognitive Disability Health Capability Framework, further recommending that the framework should be expanded to include all forms of cognitive disability throughout education and training. The curriculum development unit in intellectual disability health has developed education resources through the University of New South Wales and has released the [Intellectual Disability Health Capability Framework](#)²⁶. However, this framework does not align with recommendations 6.24 and 6.25, and there is no news available on the plan to implement the Cognitive Disability Health Capability Framework. It is also important to note the Intellectual Disability Health Capability Framework received feedback from the Queenslanders with Disability Network (**QDN**) around its use of language. QDN recommended eleven language changes, but the Australian Government only implemented two changes. Despite what appears to be progress towards these recommendations, there are currently no meaningful updates on their genuine implementation.

Recommendation 6.26: Expand the role of the Health Ministers Meeting to monitor health workforce capability development

Responsibility: Australian, state and territory governments

Response: Accept in principle

Update: No update

Recommendation 6.26 asks the Health Ministers Meeting to monitor progress of the expanded scope of the health workforce capability development framework referred to in recommendation 6.25. Without implementation of recommendation 6.25 there are no updates on this recommendation.

Recommendation 6.27: Establish regular progress reporting by accreditation authorities

Responsibility: Australian Government and non-government agencies

Response: (a) Accept in principle, (b) Accept in principle (c) Accept

Update: No update

Recommendation 6.27 calls for accreditation authorities, registered health professionals and peak bodies to review and amend accreditation standards, further recommending that specific cognitive disability health curriculum content should be developed. Though the University of New South Wales has developed lecture plans and tutorial activities²⁷ alongside the Intellectual Disability Health Capability Framework, there is no implementation plan, and it appears these are not mandatory resources.

Recommendation 6.28: Improve access to clinical placements in disability health services

Responsibility: Australian Government

Response: Accept in principle

Update: Beginning stages

Recommendation 6.28 recommends clinical placements in disability health services be prioritised within relevant degrees. The Australian Government has since launched the Intellectual Disability Health Capability Framework which includes supporting disability-specific placement opportunities for future health professionals²⁸. This resource developed by the University of New South Wales offers advice to education providers to develop links with disability organisation to facilitate placement opportunities. Hopefully this leads to increased

placements in disability health services, but as previously stated, this framework isn't mandatory for accreditors.

Recommendation 6.29: Improve specialist training and continuing professional development in cognitive disability health care

Responsibility: Australian Government & non-government agencies

Response: Accept in principle

Update: Beginning stages

Recommendation 6.29 calls for professional development in cognitive disability health care, further recommending that relevant training must continue to be improved. In addition to the previously mentioned Intellectual Disability Health Capability Framework, the newly released [National Roadmap to Improve the Health and Mental Health of Autistic People 2025-2035](#)²⁹, indicates that there is some movement on this recommendation. However, neither the Framework for the Roadmap mention continuing professional development, and it is too early to say whether relevant training is in development and ready to be implemented.

Recommendation 6.30: Expand the scope of the National Centre of Excellence in Intellectual Disability Health

Responsibility: Australian Government

Response: Note

Update: Rejected

Recommendation 6.30 asks for the scope of the National Centre of Excellence in Intellectual Disability Health to be expanded to include autism and other forms of cognitive impairment. The Australian Government's response in the DRC Progress Report 2025 clearly state that the government and the National Centre of Excellence in Intellectual Disability Health have no intention of making this change³⁰. Therefore, this recommendation is considered rejected.

Recommendation 6.31: Embed the right to equitable access to health services in key policy instruments

Responsibility: Australian, state and territory governments

Response: 6.31(a) Accept, 6.31 (b) accept in principle

Update: Beginning stages

Recommendation 6.31 calls for key policy instruments to embed the right to equitable access to health services. The Australian Government has begun consultation on the National Safety and Quality health service standards³¹ to prepare for the development of the third edition release in 2029³². With such a late release date, it's disappointing to note there appears to be no plans to amend or review either of the documents in alignment with recommendation 6.31 before 2029.

Recommendation 6.32: Increase capacity to provide supports and adaptations through improved guidance, funding and accessible information

Responsibility: Australian, state and territory governments

Response: Accept in principle

Update: No update

Recommendation 6.32 calls on governments to improve guidance around, and funding for, disability related supports and adaptations in health care. Though the National Roadmap to Improve the Health and Mental Health of Autistic People 2025-2035 begins to address the suggestions made in recommendation 6.32, it is only aimed toward autistic people. Until the health care reform described in this recommendation is made for all people with disability, there are no updates on this recommendation.

Recommendation 6.33: Develop specialised health and mental health services for people with cognitive disability

Responsibility: State and territory governments

Response: Subject to further consideration

Update: No update

Recommendation 6.33 calls for the development of specialised health and mental health services for people with cognitive disability. In the National Interim Update 2024 report, the

Queensland Government advised they funded the development of eight “Neuro Wellness Hubs” in response to this recommendation 6.33³³. However, these hubs are not a specialist service for people with cognitive disability as described by the DRC. Furthermore, in their DRC Progress Report 2025³⁴, the Queensland Government mentions the Queensland Centre of Excellence in Intellectual and Developmental Disability Mental Health. This service is not a specialised health and mental health service and therefore not applicable to this recommendation. Considering the repeated misalignment of information provided by the Queensland Government in relation to this recommendation, there is no update on its implementation.

Recommendation 6.34: Introduce disability health navigators to support navigation of health care for people with disability

Responsibility: Australian, state and territory governments

Response: Accept in principle

Update: Beginning stages

Recommendation 6.34 recommends the establishment of new disability health navigator roles. This role would be responsible for offering support to people with cognitive disability navigating the health care system. In their initial response, the Australian Government advised they were working with state and territory governments to review disability health navigation activities across the country in order to consider the scope for nationally consistent disability health navigation framework. Since this response, an intergovernmental scoping group has been established³⁵. Disability health navigators are also mentioned in the National Roadmap to Improve the Health and Mental Health of Autistic People 2025-2035³⁶.

Recommendations 6.35 – 6.36: Stronger legal frameworks for restrictive practices

Responsibility: State and territory governments

Response: Accept in principle

Update: No update

Recommendations 6.35 and 6.36 regard the use of restrictive practices and call for immediate action to ban certain restrictive practices and other law reform. The Queensland Government introduced a Disability Services (Restrictive Practices) and Other Legislation Amendment Bill

2024³⁷, however, this Bill lapsed on 1 October 2024 with the dissolution of the 57th Queensland Parliament and is yet to be re-introduced to Parliament.

Recommendation 6.37: Data collection and public reporting on psychotropic medication

Responsibility: Australian Government

Response: Accept

Update: No update

Recommendation 6.37 calls for the collection and public reporting of data on the use of psychotropic medication, further requesting annual progress reports. Whilst the Psychotropic Medicines in Cognitive Disability or Impairment Clinical Care Standard³⁸ has been released, no annual progress reports have been published, and no independent evaluation has occurred. The DRC Progress Report 2025 advises that the Australian Commission on Safety and Quality in Health Care, the Aged Care Quality and Safety Commission and the NDIS Quality and Safeguards Commission are working to establish how evaluation and reporting could be progressed³⁹. However, public reporting on data has not yet commenced.

Recommendation 6.38: Strengthening the evidence base on reducing and eliminating restrictive practices

Responsibility: Australian Government

Response: Accept in principle

Update: Beginning stages

Recommendation 6.38 asks the National Disability Research Partnership (**NDRP**) to commission a longitudinal study to research the impact of various strategies to reduce and eliminate restrictive practices. In December 2024 the NDRP delivered an event aimed at exploring the evidence to enable the elimination of restrictive practices in Australia⁴⁰. However there appears to be no information about a longitudinal study after this informative event.

Recommendations 6.39 – 6.40: Improving data on restrictive practices

Responsibility: Australian, state and territory governments

Response: Accept in principle

Update: Beginning stages

Recommendations 6.39 and 6.40 call for improvements to the collection of data on restrictive practices, further recommending the implementation of specific targets and performance indicators to eliminate restrictive practices by the end of. The DRC Progress Report 2025 mentions the Disability Reform Ministerial Council has agreed to developing a “joint action plan” addressing both recommendation 6.39 and 6.40, and processes to review data to identify consistencies and gaps have apparently begun⁴¹. With this in mind, these recommendations are in the beginning stages. However, we note governments have missed the recommended deadline.

Recommendation 6.41: Legislative prohibition of non-therapeutic sterilisation

Responsibility: Australian, state and territory governments

Response: Subject to further consideration

Update: No updates

Recommendation 6.41 asks for all jurisdiction to prohibit non-therapeutic procedures resulting in permanent sterilisation of people with disability with some exceptions. It also asks for an expansion of annual collation and publication of data on the sterilisation of people with disability. The latest Australian Sterilisation Data Report⁴² has included more demographic details but did not fully implement all recommendations for this data.

Volume 7: Inclusive education, employment and housing

Volume 7 addresses the much-needed long-term reform in education, employment and housing, with the intention of eliminating segregation in these settings.

Inclusive Education

Note: The DRC Progress Report 2025 repeatedly refers to the ‘Better and Fairer Schools Agreement – Full and Fair Funding 2025-2034’ (**the Agreement**) in response to several recommendations in this section. The Agreement is a funding agreement intended to commit parties to continue, or build on, existing strategies to make schools better and fairer for all

students, particularly those in “priority equity cohorts”. Upon reviewing the Agreement, QIDAN is disappointed to note whilst students with disability are initially included in the definition of “priority equity cohorts”, students with disability are subsequently left off the following priority areas in the Agreement:

- Year 12 certification⁴³
- Learning equity⁴⁴
- Student attendance⁴⁵.

Recommendation 7.1: Provide equal access to mainstream education and enrolment

Responsibility: State and territory governments

Response: Accept in principle

Update: In progress

Recommendation 7.1 calls for equal access to mainstream education and enrolment. In their initial response to this recommendation, the Queensland Government stated that current procedures and policies already meet the intention of this recommendation and provide a framework for equal access to mainstream education and enrolment. Though Queensland’s Department of Education enrolment processes and procedures advise that children with disability *can* enrol at their local schools, the Queensland Government has acknowledged that there is still work to be done to review enrolment practices in practice throughout Queensland.

Recommendation 7.2: Prevent the inappropriate use of exclusionary discipline against students with disability

Responsibility: Australian, state and territory governments

Response: Accept in principle

Update: No update

Recommendation 7.2 calls for the prevention of inappropriate use of exclusionary discipline against students with disability. New statistics show an increase in the percentage of students with disability facing a school disciplinary absence (short suspensions, long suspensions, exclusions and enrolment cancellations), with 62% of disciplined students in term 2 of 2025 being students with disability⁴⁶. The Australian Government is currently in the middle of a scheduled review of the *Disability Standards for Education 2005*⁴⁷. It is yet to be seen whether the outcomes of this review will align with this recommendation.

Recommendation 7.3: Improve policies and procedures on the provision of reasonable adjustments to students with disability

Responsibility: Australian, state and territory governments

Response: Accept in principle

Update: Beginning stages

Recommendation 7.3 calls for improved access to reasonable adjustments in schools by reforming and improving relevant policies and procedures. The Queensland Government Department of Education mentions improvements to reasonable adjustments in the [Disability Service Plan 2025-2028](#)⁴⁸, but it has yet to be seen whether any outcomes from this plan have occurred. As previously mentioned, The Australian Government are in the middle process of a scheduled review of the Disability Standards for Education 2005.

Recommendation 7.4: Participation in school communities

Responsibility: State and territory governments

Response: Accept

Update: Beginning stages of implementation

Recommendation 7.4 calls on state and territory school education authorities to improve opportunities for students with disability to participate in their school communities. The Queensland Government stated it would strengthen current procedures and policies, and then subsequently announced \$181.3 million in funding for six new special schools across Queensland⁴⁹. The Queensland Government has further advised these schools will mostly be co-located with mainstream schools in line with the DRC⁵⁰. Co-location aligns with only part of this recommendation, and it is yet to be seen how the Queensland Government aims to facilitate partnerships between new and existing special schools and mainstream schools, especially when co-locating. In the DRC Progress Report 2025, it is stated the Department of Education is planning to facilitate greater participation of students enrolled in special schools⁵¹. With this in mind this recommendation is at the beginning stages of implementation. However continued progress depends on whether the Queensland Government is proactive at strengthening partnerships.

Recommendation 7.5: Careers guidance and transition support services

Responsibility: State and territory governments

Response: Accept in principle

Update: No update

Recommendation 7.5 asks state and territory educational authorities to improve outcomes for students with disability who are transitioning to further education or employment. The DRC Progress Report 2025 mentions the Department of Education will soon commence a review of transition supports, though no timeframes nor further information has been provided⁵².

Recommendation 7.6: Student and parental communication and relationships

Responsibility: Australian, state and territory governments

Response: Accept in principle

Update: Beginning stages

Recommendation 7.6 discussed updating policy and procedures to improve student and parental communications and relationships with schools. One of the stated actions of the Department of Education Queensland Disability Service Plan 2025-2028 is to promote best practice in communication, but it is not specific to student and parental communications⁵³. Furthermore, as the plan is still new, we are yet to see whether the action is being practiced. As previously mentioned, the Disability Standards for Education 2005 is currently being reviewed.

Recommendation 7.7: Inclusive education units and First Nations expertise

Responsibility: State and territory governments

Response: Subject to further consideration

Update: No update

Recommendation 7.7 calls for the development of inclusive education units within departments who could provide advice on inclusive education. This recommendation further asks education authorities to utilise First Nations expertise to improve access to inclusive and culturally appropriate education for First Nations students with disability. The Department of Education Queensland Disability Service Plan 2025-2028⁵⁴ mentions “supporting local consultative education bodies to collaborate with schools and local community to provide

culturally appropriate responses”. However, this doesn’t align with this recommendation, leaning on community rather than official education units.

Recommendation 7.8: Workforce capabilities, expertise and development

Responsibility: Australian, state and territory governments

Response: Accept in principle

Update: Beginning stages

Recommendation 7.8 calls for improved disability awareness throughout education workforces' capabilities, expertise and development. The Australian Government has made an addendum to accreditation standards and procedures to mention diverse learning needs, including for students with disability, calling for the changes to be implemented by December 2025⁵⁵.

Recommendation 7.9: Data, evidence and building best practice

Responsibility: Australian, state and territory governments

Response: Accept in principle

Update: No update

Recommendation 7.9 recommends education authorities improve data and evidence collection, with the aim to support evidence-based practice. In the DRC Progress Report 2025, it is noted the Education Ministers made disability and inclusion a priority topic in AERO’S 2025 Research Agenda⁵⁶. However, it is currently unclear if this means the education system will collect the types of data described by recommendation 7.9.

Recommendation 7.10: Complaint management

Responsibility: Australian, state and territory governments

Response: Accept in principle

Update: No update

Recommendation 7.10 calls for improved complaints processes within schools, including with the expansion or creation of complaint management offices, and amendment to the complaint management procedures in the *Disability Standards for Education 2005*. As the Disability Standards for Education 2005 review is still in progress, it is yet to be seen if the outcomes of the review will align with this recommendation. It is also worth noting that the Queensland

Government released a new complaints and grievances management policy in 2025 which includes new information about human rights complaints specific to the Department of Education⁵⁷. QIDAN note that this is not the equivalent of having embedded complaints management offices that are equipped to handle all types of complaints.

Recommendation 7.11: Stronger oversight and enforcement of school duties

Responsibility: State and territory governments

Response: Subject to further consideration

Update: No update

Recommendation 7.11 aims to strengthen school registration requirements. The Queensland Governments recently announced Red Tape Reduction Plan⁵⁸, which intends to simplify policies, procedures and initiatives to reduce administrative burden. It is unclear whether this will influence school registration and compliance monitoring.

Recommendation 7.12: Improving funding

Responsibility: Australian, State and territory governments

Response: Accept in principle

Update: No update

Recommendation 7.12 aims to improve funding for reasonable adjustments and greater transparency on how the funding for reasonable adjustments is used. There currently appears to be no updates on the progress of this recommendation.

Recommendation 7.13: National Roadmap to Inclusive Education

Responsibility: Australian, state and territory governments

Response: Accept in principle

Update: No update

Recommendation 7.13 urged the Education Ministers Meeting to release a National Roadmap to Inclusive Education, further recommending that state ministers report their progress in alignment with the roadmap. The DRC Progress Report 2025 mentions that the Education Ministers should have received advice on developing policy responses in the second half of 2025⁵⁹. However, there is no news available on whether a National Roadmap is in development.

Recommendations 7.14 – 7.15: Phasing out and ending special/ segregated education

Responsibility: Australian, state and territory governments

Response: Note

Update: No update

Recommendations 7.14 and 7.15 propose phasing out and ending segregated education, further offering alternative plans if ending segregated education is not agreed to. In their initial responses to these recommendations, the Australian and Queensland Governments stressed the importance of parental choice, and the Queensland Government subsequently invested in six new special schools, a choice which directly opposes the call to end segregated learning. The Queensland Government have justified funding these additional schools to “give parents choice”⁶⁰. It is essential to note the Convention on the Rights of Persons with Disabilities states “inclusive education is to be understood as a fundamental human right of all learners. Notably, education is the right of the individual learner, and not, in the case of children, the right of a parent or caregiver. Parental responsibilities in this regard are subordinate to the rights of the child.”⁶¹ The Queensland Government’s decision to prioritise parental choice over the rights of children with disabilities and access to inclusive education goes against the concept of inclusive education.

Inclusive Employment

Recommendations 7.16 – 7.17: New Disability Employment Services Model and education and training resources

Responsibility: Australian Government

Response: Accept

Update: In progress

Recommendations 7.16 and 7.17 call for improvements to the Disability Employment Services model, requesting the development of the new Disability Employment Services model be co-designed, flexible and customisable. The Australian Government has since launched the new disability employment program ‘Inclusive Employment Australia’⁶² as well as the ‘Centre for Inclusive Employment’⁶³. These two new programs directly align with recommendations 7.16 and 7.17. Since these two programs are still new, resources are still being developed and changes to policies (like funding arrangements) are yet to be seen in effect.

Recommendations 7.18 – 7.23: Improving Access to Employment

Responsibility: Australian, state and territory governments

Response: Accept in principle

Update: Beginning stages

Recommendations 7.18 through to 7.23 refer to improving people with disability's access to employment in the public sector. These recommendations are directed at the Australian Public Service Commission and governments, asking for these bodies to adopt targets to increase employment levels, amend principles and policies and increase reporting on the progress of disability employment strategies. The Australian Public Services Commission established a DRC Discovery Project⁶⁴ to investigate the implementation of these recommendations. Unfortunately, the public sector is yet to reach its goal of 7% employees with disability, with most recent data demonstrating that only 5.5% of employees have disability⁶⁵.

Recommendation 7.24: Convene a Disability Employment Rights Council

Responsibility: Australian Government

Response: Note

Update: No update

This recommendation asks the Australian Government to convene a Disability Employment Rights Council. This recommendation does not appear to be progressing.

Recommendation 7.25: Updating the Fair Work Act

Responsibility: Australian Government

Response: Accept in principle

Update: Beginning stages

Recommendation 7.25 asks for the amendment of the *Fair Work Act 2009* (Cth) to align with the definition of 'disability' used within the *Disability Discrimination Act 1992* (Cth). The Australian Government completed its consultation into the review of the *Disability Discrimination act 1992* on the 14th of November 2025⁶⁶ but there have been no further updates on how this review will affect the *Fair Work Act 2009* (Cth).

Recommendation 7.26: Amend the Disability Discrimination Act 1992

Responsibility: Australian Government

Response: Accept in principle

Update: Beginning stages

Recommendation 7.26 calls for amendments to the *Disability Discrimination Act 1992* (Cth) to expand the factors considered when making reasonable adjustments. The Australian Government is currently undergoing a review of the *Disability Discrimination Act 1992* (Cth). It is yet to be seen whether the outcomes of this review align with these recommendations.

Recommendation 7.27: Enable a Fair Work Ombudsman referral mechanism

Responsibility: Australian Government

Response: Accept

Update: Implemented

Recommendation 7.27 asks for an expansion of the functions of the Fair Work Ombudsman (state and territory governments) to include a referral function for people with disability to have their complaint addressed by the Fair Work Ombudsman. In its initial response, the Australian Government stated it already has statutory functions allowing for referrals back to the Fair Work Ombudsman.

Recommendation 7.28: Improve information about wages and the Disability Support Pension

Responsibility: Australian Government

Response: Accept

Update: Implemented

Recommendation 7.28 calls for the improvement of information on wages and the disability support pension. As of November 2025, the Australian Government has funded a new Disability Employment Advocacy and Information Program⁶⁷ which has replaced the Disability Employment Services. With this new program, Inclusive Employment Australia will progressively offer resources, tools, and training. There has also been allocation of funding for Supported Employment and Advocacy Project⁶⁸ throughout Australia. This enables eight advocacy organisations to enact employment advocacy. These programs are currently

underway, and ADA Australia have been funded to provide advocacy and information in Queenslanders until 2027.

Recommendation 7.29: Embed an ‘open employment first’ approach in the NDIS

Participant Employment Strategy

Responsibility: Australian Government

Response: Accept

Update: In progress

Recommendation 7.29 recommends an ‘open employment first’ approach in the NDIS Participant Employment Strategy. The Strategy should also provide training to Local Area Coordinators, National Disability Insurance Agency planners, and support coordinators on supporting participants to achieve goals in open employment. The Australian Government has since launched the new NDIS Participant Employment Strategy 2024-2026. One of the stated outcomes of the Strategy is that participants should have real choice and control in where they work and who supports them⁶⁹. This aligns with the recommendation 7.29, however, the effectiveness of this strategy is yet to be seen.

Recommendation 7.30: Support the transition to inclusive employment

Responsibility: Australian Government

Response: Accept in principle

Update: No update

Recommendation 7.30 proposes the Australian Department of Social Services develop a plan to support people with disability working in Australian Disability Enterprises to move to inclusive, open employment options. Though the Australian Government has since made updates to its Supported Employment Plan⁷⁰ to better reflect recommendation 7.30, the Supported Employment Plan does not directly address ending segregated employment.

Recommendation 7.31: Raise subminimum wages

Responsibility: Australian Government

Response: Subject to further consideration

Update: Beginning stages

Recommendation 7.31 asks the Australian Government to raise subminimum wages for people with disability to at least 50% of the current minimum wage. This recommendation was subject to consultation in the discussion paper “Next steps in Supported Employment: consultation on the way forward”. It is yet to be seen what came from this consultation and whether this recommendation will be implemented. Given the incompatibility of subminimum wages with human rights obligations set out in the Convention on the Rights of Persons with Disabilities, the Australian Government’s response to this recommendation is disappointing.

Recommendation 7.32: End segregated employment by 2034

Responsibility: Australian, state and territory governments

Response: Subject to further consideration

Update: Beginning stages

Recommendation 7.32 sets a deadline to end segregated employment by 2034, recommending the development and implementation of a National Inclusive Employment Roadmap to transform Australian Disability Enterprises, and the elimination of subminimum wages. Though a new Inclusive Employment Australia program has been launched, there is no news on the development of the roadmap yet. This recommendation is subject to consultation on the discussion paper “Next steps in Supported Employment: consultation on the way forward”.

Inclusive Housing

Recommendation 7.33: Prioritise people with disability in key national housing and homelessness approaches

Responsibility: Australian, state and territory governments

Response: Accept in principle

Update: In progress

Recommendation 7.33 calls for key national housing and homelessness approaches to prioritise people with disability. The Queensland Government has since launched the

Partnering for Inclusive Housing with Queenslanders with Disability 2024-2027. This roadmap hopes to improve housing outcomes for people with disability; however, other key housing and homelessness plans have not aligned with this recommendation. For instance, The National Agreement on Social Housing and Homelessness does not identify people with disability as a priority group⁷¹. As the Queensland Government has implemented a housing plan with people with disability as a priority, this recommendation has been implemented at a state level. National level implementation is yet to be seen.

Recommendation 7.34: Include homelessness in Australia's Disability Strategy

Responsibility: Australian, state and territory governments

Response: Accept

Update: Implemented

Recommendation 7.34 calls for the Australian Disability Strategy (**ADS**) to include a focus on homelessness. This was accepted by all Governments, and the ADS now includes a section on the development of a new Policy Priority area addressing homelessness in the ADS⁷².

Recommendation 7.35: Increase the availability and supply of accessible and adaptive housing for people with disability through the National Construction Code

Responsibility: State and territory governments

Response: Accept in principle

Update: Beginning stages

Recommendation 7.35 asks for an increase in the availability and supply of accessible and adaptive housing. The Queensland Government has since implemented the Modern Homes Standards which includes the Liveable Housing Design Standard (**LHD**)⁷³, and 50% of social housing currently being constructed will apparently meet the LHD at gold or platinum level whilst upholding a minimum standard⁷⁴. The Queensland Government have also initiated a desktop audit into Government-owned crisis accommodation, with consideration to their accessibility.

Recommendation 7.36: Improve social housing operational policy and processes

Responsibility: State and territory governments

Response: Accept

Update: Beginning stages

Recommendation 7.36 calls for social housing operational policies and processes to include accessible and inclusive processes for allocating and modifying social housing for people with disability. In the DRC Progress Report 2025, the Queensland Department of Housing mention that there is currently a review of existing processes for home modification, as well as a review of communication and resources for people with disability⁷⁵.

Recommendation 7.37: Increase tenancy and occupancy protections for people with disability

Responsibility: State and territory governments

Response: Subject to further consideration

Update: No update

Recommendation 7.37 calls for reviews into relevant legislation with the aim to increase tenancy and occupancy protections for people with disability. Queensland has since undergone a rental law reform⁷⁶, but unfortunately the reform did not align with changes outlined in this recommendation. In the DRC Progress Report 2025, the Queensland Department of Housing mentions commencing work on identifying issues for tenants with disability, acknowledging further consideration in this space is required⁷⁷.

Recommendation 7.38: Minimum service standards and monitoring and oversight of supported residential services and their equivalents

Responsibility: State and territory governments

Response: Subject to further consideration

Update: No update

Recommendation 7.38 proposes the implementation of minimum service and accommodation standards, the strengthening of oversight mechanisms, and increased service-level monitoring activities and compliance actions. In the 'Partnering for Inclusive Housing with Queenslanders with Disability 2024-2027'⁷⁸ the Queensland Government

commits to reviewing the *Residential Services (Accreditation) Act 2002 (Qld)*; however, this review has not yet commenced.

Recommendation 7.39: Preventing homelessness when people with disability transition from service or institutional settings

Responsibility: Australia, state and territory governments

Response: Accepted in principle

Update: No update

Recommendation 7.39 asks state and territory governments to commit to a policy of ‘no leaving into homelessness’. This would be achieved with the establishment of a lead agency who is responsible for planning and coordinating the transition of people with disability out of institutions and into safe and appropriate housing. Unfortunately, there are no updates on the implementation of this recommendation.

Recommendation 7.40: Address homelessness for people with disability in the National Housing and Homelessness Plan

Responsibility: Australian, state and territory governments

Response: Subject to further consideration

Update: Rejected

Recommendation 7.40 calls for the National Housing and Homelessness Plan to address homelessness experienced by people with disability. The Australian Government has since changed the National Housing and Homelessness Plan to the National Agreement on Social Housing and Homelessness. In the Australian Government’s response, they maintain the plan focuses on supporting *all* individuals, stating it will not prioritise different cohorts, only acknowledging they face additional barriers⁷⁹. This means the Australian Government won’t be prioritising people with disability in housing and homelessness despite recognition of additional barriers, and this position represents a rejection of the recommendation.

Recommendation 7.41: Group home reform

Responsibility: Australian Government

Response: Accepted in principle

Update: Beginning stages

Recommendation 7.41 proposes the NDIS must prioritise the implementation of the [Own Motion Inquiry into Aspects of Supported Accommodation – Action Plan \(the Action Plan\)](#). The NDIS has since conducted a consultation and has initiated the NDIS practice standards reform⁸⁰, which is a direct result of implementing the Action Plan.

Recommendation 7.42: Improve access to alternative housing options

Responsibility: Australian, state and territory governments

Response: Accept in principle

Update: No update

Recommendation 7.42 calls for increased housing options and supports to be made available to people with disability, with the aim of improving access to the housing market. The Queensland Government has since funded a resource for people with disability and their families to assist at the start of someone's housing journey called the [My Housing Options Workbook \(the Toolkit\)](#)⁸¹. The Toolkit is a great resource that can help people plan how they will access housing, however, it does not increase housing options or access to housing.

Recommendation 7.43 – 7.44: Abolishment of group homes

Responsibility: Australian, state and territory governments

Response: Subject to further consideration

Update: Beginning stages

Recommendations 7.43 and 7.44 call for the abolishment of group homes. Four Commissioners asked Australian, state and territory governments to implement a roadmap to phase out group homes within the next 15 years, and one commissioner asked for group homes to be phased out in stages, reducing the reliance on group homes over a generational timeline. Since the DRC report was published, there have been several reviews into groups homes. The NDIA, in the Response to the Own Motion Inquiry into Aspects of Supported Accommodation⁸², recognised the need to regulate group home settings. Additionally, the Queensland Government established an inquiry into the provision and regulation of supported

accommodation in Queensland. Recommendations made by the Inquiry called for improvements to safeguards, best practice, staffing and a framework aligning with the *Human Rights Act 2019*. Furthermore, the Queensland Government's 'Partnering for Inclusive Housing 2024-2027' Roadmap mentions "a move away from outdated legacy group homes"⁸³.

Whilst these acknowledgements are positive first steps towards phasing out group homes, the work is yet to be done. Implementation of this recommendation depends on what happens next, and with this in mind this recommendation is in the beginning stages. It is important to note without proactive commitment from all governments, this recommendation will never be fully implemented.

Volume 8: Criminal justice and people with disability

Volume 8 focuses on the criminal justice system, and the significant overrepresentation of children, young people and adults with disability in the system. The recommendations in volume 8 aim to address the disproportionate harm experienced by people with disability in the criminal justice system by making suggestions around improving the conditions for people with disability in custody, deterring the use of indefinite detention and solitary confinement, as well as other recommendations focusing on safeguarding and the reduction of harm within the system.

Recommendation 8.1: Conditions in custody for people with disability

Responsibility: State and territory governments

Response: Accept in principle

Update: Beginning stages

Recommendation 8.1 recommends states and territories uphold the rights of incarcerated peoples with disability in line with the Convention on the Rights of Persons with Disabilities (CRPD). The Queensland Government's Department of Youth Justice Interim Disability Service Plan 2026 – 2026 (YJIDSP) mentions that the plan aligns with Queensland's obligations under the CRPD but doesn't provide specific references to the CRPD. As we are yet to see how the Queensland Government uses the YJIDSP and the CRPD to uphold the rights of incarcerated peoples with disability, this recommendation is in the beginning stages of implementation.

Recommendation 8.2: Disability awareness in OPCAT monitoring

Responsibility: Australian, state and territory governments

Response: Accept in principle/subject to further consideration

Update: No update

Recommendation 8.2 recommends the Australian Government, in collaboration with state and territory governments, improve disability awareness in the monitoring and implementation of the Optional Protocol to the Convention Against Torture and Other Cruel, Inhuman or Reggrading Treatment (**OPCAT**). The recent United Nations Universal Periodic Review of Australia focused on Australia's failure to implement the OPCAT, urging the governments to ensure all fundamental legal safeguards are guaranteed "both in law and practice"⁸⁴. Despite this, QIDAN found no evidence of any progression of this recommendation.

Recommendation 8.3: Prohibiting solitary confinement in youth detention

Responsibility: State and territory governments

Response: Accept in principle

Update: No update

Recommendation 8.3 recommends the prohibition of the use of solitary confinement in youth detention. Concerningly, the Queensland Government considers this recommendation completed, stating Queensland already protects against the use of solitary confinement, further describing circumstances in which separating and isolating incarcerated children and young people is allowable⁸⁵. QIDAN note although the Queensland Government does not use the term 'solitary confinement' to describe practices of separating children and young people for extended periods of time (including periods of 22 hours and over), solitary confinement does indeed occur in youth detention centres and watch houses and described in by the Queensland Ombudsman in their combined inspection report⁸⁶. Furthermore, Professor Tamara Walsh's forthcoming report 'Solitary Confinement of Unsentenced Children in Queensland Watchhouses, and Why It Might Be Unlawful' aligns with the findings of the DRC and demonstrates how it can be argued solitary confinement of children is indeed occurring in watchhouses, and many of the principles of this argument can be applied to youth detention settings. With this in mind, there are no updates on the implementation of this recommendation, and QIDAN notes its disappointment in the Queensland Government for

marking this recommendation as being complete contrary to evidence, research, and ample testimony of children and young people who have experienced solitary confinement.

Recommendation 8.4: Screening and assessment for disability in youth detention

Responsibility: State and territory governments

Response: Accept in principle

Update: Beginning stages

Recommendation 8.4 regards the need to improve disability screening and assessments in youth detention. The Youth Justice and Victim Support Disability Service Plan 2026 – 2027⁸⁷ directly addresses this recommendation, mentioning screening and assessment services are planned to be rolled out by December 2026, except for North and Far North Queensland which is scheduled for December 2027.

Recommendation 8.5: Disability training for staff in youth detention

Responsibility: State and territory governments

Response: Accept

Update: Beginning stages

Recommendation 8.5 recommends youth detention staff receive ongoing training on working with children with disability. Both the DRC Progress Report 2025⁸⁸ and the Youth Justice and Victim Support Disability Service Plan 2026 – 2027 (**YJVSDSP**) refers to the development of a Neurodevelopmental Disability Framework, as a response to providing ongoing disability training for staff. However, the YJVSDSP states the training is for on-boarding staff only despite the recommendation specifying ongoing training. The Disability service plan also contains an action to “continuously update disability awareness training options on a range of topics pertaining to disability and intersectionality”. However, QIDAN note that e-learning disability modules will be non-mandatory⁸⁹. QIDAN is disappointed that disability training courses are non-mandatory.

Recommendations 8.6 – 8.10 – Western Australia, New South Wales and Northern Territory Youth Justice systems

Recommendations 8.6 to 8.10 were not directed at Queensland, so there are no updates applicable. However, it should be noted QIDAN supports these recommendations and calls for similar changes to be implemented within the Queensland context.

Recommendation 8.11: Information for courts and legal practitioners

Responsibility: Australian, state and territory governments

Response: Accept in principle

Update: Beginning Stages

Recommendation 8.11 proposes that information about reasonable adjustments and accessing supports and services should be available throughout the criminal justice system. In April 2026, Queensland's Department of Justice initiated the 'Consultation on court and tribunal users with disability' in direct response to recommendation 8.11⁹⁰. The consultation is gathering feedback by the end of May 2026, and the Department of Justice have noted that feedback will "inform the next steps of the Courts and Tribunal Accessibility project"⁹¹. This is a positive first step in implementing this recommendation.

Recommendation 8.12: Implementation of the National Principles

Responsibility: Australia, state and territory governments

Response: Accept in principle

Update: Beginning stages

Recommendation 8.12 calls for revision of the National Statement of Principles Relating to Persons Unfit to Plead or Not Guilty by Reason of Cognitive or Mental Health Impairment (**the National Principles**) by the Standing Council of Attorney-General. In their 2025 update, the Australian Government mentions the Attorney-General has since done a "desktop analysis" to inform this review, also offering the review of the National Principles is included in a 2025 working plan⁹². Unfortunately, there has been no update from the Queensland Government. This recommendation is in the beginning stages.

Recommendation 8.13: Data about people detained in forensic systems

Responsibility: Australia, state and territory governments

Response: Accept in principle

Update: No update

Recommendation 8.13 asks for the collection and publication of data relating to people who are found to be unfit to plead guilty or not guilty by reason of cognitive or mental health impairment. In the DRC 225 Response Report, the Australian Government refers to an initial scoping exercise through existing data sharing forums⁹³. QIDAN does not consider initial scoping work to be a meaningful update on recommendation 8.13.

Recommendation 8.14: National practice guidelines for screening in custody

Responsibility: State and territory governments

Response: Accept

Update: No update

Recommendation 8.14 recommends nationally consistent practice guidelines for screening for disability in custody be developed and implemented. Though the Youth Justice and Victim Support Disability Service Plan 2026 – 2027⁹⁴ proposes implementing disability screening tools in line with the DRC, there is no mention of what the Queensland Government is doing to ensure that approaches are nationally consistent. Furthermore, there appears to be no mention of developing nationally consistent screening tools in adult corrective services.

Recommendation 8.15: Policies and practices on screening, identifying and diagnosing disability in custody

Responsibility: State and territory governments

Response: Accept in principle

Update: No update

Recommendation 8.15 asks state and territories to ensure policies and practices related to screening and diagnosing disability are consistent with the national practice guidelines proposed in recommendation 8.14. As the National practice guidelines are yet to be developed this recommendation cannot progress.

Recommendation 8.16: Support by First Nations organisations to people in custody

Responsibility: State and territory governments

Response: Accept

Update: No update

Recommendation 8.16 regards the need for states and territories to engage with First Nations organisations in the development of culturally safe disability screening and assessment services for First Nations incarcerated peoples. There are no updates on the implementation of this recommendation.

Recommendation 8.17: NDIS Applied Principles and Tables of Support concerning the justice system

Responsibility: Australia, state and territory governments

Response: Subject for further consideration

Update: No update

Recommendation 8.17 calls for the review and improvement of the NDIS Applied Principles and Tables of Support, with a focus on the intersection between disability and the criminal justice system and improving access to disability-related supports of people who are incarcerated. In their initial responses, both governments indicated they did not firmly commitment to implementing this recommendation, and there has been no progress.

Recommendation 8.18: Timing of NDIA-funded transition supports

Responsibility: Australian Government

Response: Accept

Update: Beginning stages

Recommendation 8.18 calls for the NDIA to issue guidelines clearly stating an incarcerated person's release date is not a precondition for the NDIS to approve funding for transitional support. The NDIA has amended their justice operational guideline and removed reference to release dates⁹⁵, completing part of this recommendation.

Recommendations 8.19 – 8.20 Amend the *Disability Discrimination Act 1992 (Cth)* and improve police responses

Responsibility: Australian Government, state and territory governments

Response: Accept in principle

Update: Beginning stages

Recommendation 8.19 and 8.20 regard police responses to people with disability, including amending the *Disability Discrimination Act 1992 (Cth)* to acknowledge police services under the definition of ‘services’, and developing and implementing strategies to improve police responses. The Attorney-General’s Department has begun a review into the *Disability Act 1992*, and the [Queensland Disability Service Plan 2023 – 2026](#) sets a framework for improving police responses to people with disability. However, there is little information available to track whether the framework has been implemented and whether it has been successful or not.

Recommendation 8.21: Diversion of people with cognitive disability from criminal proceedings

Responsibility: State and territory governments

Response: Accept in principle

Update: Beginning stages

Recommendation 8.21 recommends developing and implementing court-based diversion programs for people with disability charges with summary offences in local or magistrates’ courts. The DRC Progress Report 2025 mentions a pilot disability stream for adults in the Brisbane Magistrates court.⁹⁶ However, with no available data the effectiveness of this pilot is yet to be seen.

Recommendation 8.22: Age of criminal responsibility

Responsibility: State and territory governments

Response: Do not support

Update: Rejected

Recommendation 8.22 recommends states and territories raise the age of criminal responsibility to fourteen. Controversially, this is the only recommendation explicitly rejected by the Queensland Government. This decision by the Queensland Government was made

despite considerable evidence supporting the need to raise the age of criminal responsibility, and the ongoing advocacy of the [Raise the Age campaign](#)⁹⁷.

Recommendation 8.23 – 8.24: Address violence against women and children with disability

Responsibility: Australian, state and territory governments

Response: Accept in principle/subject to further consideration

Update: Beginning stages

Recommendations 8.23 and 8.24 call for the acknowledgement of women and children with disability who experience domestic and family violence, and how to improve strategies to reduce domestic and family violence experienced by people with disability. This includes establishing a nationally consistent disability-inclusive definition of family and domestic violence. The DRC Progress Report 2025 mentions a disability lens will be used in the First Action Plan.⁹⁸ The commonwealth Attorney-General's department is also currently conducting a national review of Domestic Violence Order frameworks. This review was noted as an opportunity to implement recommendation 8.24⁹⁹.

Volume 9: First Nations peoples with disability

Volume 9 addresses the unique forms of discrimination, marginalisation and barriers to safety and inclusion experienced by First Nations people with disability. The recommendations in this volume call for changes across many systems that disproportionality impact First Nations people, including the child protection system, criminal punishment systems, the health system, the NDIS and other disability-related supports. The volume also calls for the establishment of a First Nations Disability Forum to lead reform across strategies and policies with the aim of strengthening cultural safety standards and inclusion.

Recommendation 9.1: Culturally appropriate parenting capacity assessments

Responsibility: State and territory governments

Response: Accept in principle

Update: No updates

Recommendation 9.1 recommends states and territories work with First Nations leaders in the child protection space to co-design principles and guidelines for parenting capacity

assessments for First Nations parents with disability who are engaged in, or at risk of being engaged in, the child safety system. In addition to the DRC, The Public Advocate's 2025 report *Supporting parents with cognitive disability in Queensland: the need for reform*¹⁰⁰ also highlights how First Nations parents are disproportionately disadvantaged by current parenting capacity assessments. Unfortunately, there are no updates on the implementation of this recommendation.

Note: The Queensland Government changed its position on this recommendation, downgrading its commitment from “accept” to “accept in principle”.

Recommendation 9.2: Ages and Stages Questionnaire-Talking about Raising Aboriginal Kids

Responsibility: Australian, state and territory governments

Response: Accept in principle

Update: Beginning stages

Recommendation 9.2 is aimed at ensuring all First Nations children up to the age of five who are exiting out-of-home care are screened using the culturally adapted developmental screening Ages and Stages Questionnaire-Talking about Raising Aboriginal Kids (**ASQ-TRAK**) tool. The DRC Progress Report 2025 mentions that there is currently a consultation on the use of ASQ-TRAK¹⁰¹.

Recommendation 9.3: Cultural safety of First Nations people in criminal justice settings

Responsibility: State and territory governments

Response: Accept in principle

Update: Beginning stages

Recommendation 9.3 calls for the review of justice strategies, with the aim of strengthening cultural safety within the criminal punishment system. The First Nations Justice Office within the Department of Justice is currently leading the implementation of this recommendation, beginning with a review of “criminal justice strategies”, with the goal of identifying its own recommendations on how to improve cultural safety within the system¹⁰².

Recommendation 9.4: Expand community connector programs

Responsibility: Australian Government

Response: Accept

Update: Beginning stages

Recommendation 9.4 regards expanding the coverage of the NDIA's community connector programs for First Nations peoples with disability living in remote communities. This includes providing adequate and long-term funding to deliver the programs. A NDIS draft discussion paper on the NDIS First Nations Market dated 17 October 2025 mentions one of the priority areas of the NDIA to improve the market is to “expand the remote community connector program to recognise providers with extra NDIS-adjacent supports”, and also to create a regional hub network for participants living between remote locations¹⁰³. The DRC Progress Report 2025 mentions an expected expansion from 38 contracts to 50, covering 575 communities with a tendering process currently underway¹⁰⁴.

Recommendation 9.5: Block funding the community-controlled sector

Responsibility: Australian Government

Response: Accept in principle

Update: No update

Recommendation 9.5 recommends the NDIA provide block funding for First Nations Community Controlled organisations to deliver NDIS services and supports. The DRC Progress Report 2025 claims that this recommendation is in progress because the NDIS have contracted the National Aboriginal Community-Controlled Organisation (**NACCHO**) for 18 months, further stating the NACCHO will be working with state and territories on service delivery models “may include models that require block funding arrangement for the Aboriginal Community Controlled Health Sector”¹⁰⁵. Though QIDAN is supportive of the work NACCHO is doing with the NDIA, we do not think that NDIS is clearly and genuinely committed to block funding.

Recommendation 9.6: National Disability Insurance Agency Board

Responsibility: Australian Government

Response: Accept in principle

Update: Implemented

Recommendation 9.6 recommends the *National Disability Insurance Scheme Act 2013* (Cth) be amended to ensure the NDIA Board must include at least one First Nations person at any given time. The Act has been amended, and NDIA is now required to ensure at least one member of the Board other than the Chair is an Indigenous person¹⁰⁶.

Recommendation 9.7: Participation in cultural life

Responsibility: Australian Government

Response: Accept in principle

Update: In progress

Recommendations 9.7 recommends an additional amendment to the *National Disability Insurance Scheme Act 2013* (Cth) protecting the rights of First Nations participants to participate in cultural life, in addition to participate in social and economic life. The *NDIS Amendment (Getting the NDIS Back on Track No. 1) Bill 2025* includes Transitional Rules which specifically recognise participation in cultural activities as a NDIS funded support for First Nations participants¹⁰⁷. The DRC Progress Report 2025 further described the ongoing work the NDIA is doing to support the rights of First Nations participants, including with the establishment of the Independent Advisory Council First Nations Reference Group, which will help to develop guidelines underpinning First Nations participant's engagement in cultural life.

Recommendation 9.8: Return to Country

Responsibility: Australian Government

Response: Accept in principle

Update: Beginning stages

Recommendation 9.8 calls for cultural supports and Return to Country trips to be recognised by the NDIS, including with the creation of a new line item in the Pricing Agreement, and through the development of guidelines for NDIS staff on cultural supports. The NDIS draft discussion paper on the NDIS First Nations Market dated 17 October 2025 introduces the idea of developing a Return to Country policy. The DRC Progress Report 2025 refers to the

development of a First Nation Strategy Implementation plan, which will supposedly include options for Return to Country¹⁰⁸.

Recommendation 9.9: Criteria for funding family supports

Responsibility: Australian Government

Response: Accept in principle

Update: Beginning stages

Recommendation 9.9 proposes that First Nations family members of First Nations NDIS participants living in remote communities should be funded to provide supports, and policy guidelines supporting this arrangement should be developed by a co-designed process. According to the NDIS website, the Remote Service Delivery Framework aligns with the DRC, however this framework is not publicly available, so it is unclear whether it truly does align with recommendation 9.9¹⁰⁹. Further, The DRC Progress Report 2025 claims this recommendation is in progress, referencing the NDIS First Nations Strategy 2025-2030 and stating the NDIS is commencing policy designed around funding family supports¹¹⁰. It is worth noting that nowhere in the NDIS First Nations Strategy 2025 – 2030 is it mentioned family supports should be funded, nor has the NDIA confirmed explicitly they will be funding family supports.

Recommendation 9.10: First Nations Disability Forum

Responsibility: Australian, state and territory governments

Response: Accept in principle

Update: Beginning stages

Recommendation 9.10 proposes the establishment of a First Nations Disability Forum to lead the implementation of the Disability Sector Strengthening Plan, suggesting that the Forum should have been established by the end of 2024. Public consultations on the establishment of a First Nations Disability Forum were held from December 2024 to February 2025¹¹¹. However, there are no publicly available updates on the outcomes of the consultation nor the establishment of the Forum.

Recommendation 9.11: Building on the Disability Sector Strengthening Plan

Responsibility: Australian, state and territory governments

Response: Accept in principle

Update: No update

Recommendation 9.11 recommends revising the Disability Sector Strengthening Plan in partnership with the First Nations Disability Forum. As mentioned above, the First Nations Disability Forum has yet to be established. According to the National Interim Progress report, the government agencies are working with the First Peoples Disability Network on implementing the Disability Sector Strengthening Plan¹¹². However, there is no information on whether there is any intention to revise the Plan in line with the DRC's proposal.

Recommendation 9.12: Disability-inclusive cultural safety standards

Responsibility: Australian Government

Response: Accept in principle

Update: No update

Recommendation 9.12 calls for the development of disability-inclusive cultural safety standards for the provision of standards for First Nations people with disability as led by the Australian Government in partnership with the First Nations Disability Forum. Without implementation of the First Nations Disability Forum, this recommendation won't be finalised,

Recommendation 9.13: Remote workforce development

Responsibility: Australian, state and territory governments

Response: Accept in principle

Update: No update

Recommendation 9.13 recommends the development of a strategy to develop First Nations local workforces in remote communities, led by the First Nations Disability Forum and parties to the Disability Sector Strengthening Plan. Again, there are no updates on the establishment of the First Nations Disability Forum and the revision of the Disability Sector Strengthening Plan, and there is no information on the development of the proposed strategy.

Volume 10: Disability Services

Volume 10 examines service provision, and the neglect, violence, exploitation and abuse experienced by people with disability by disability-related services and supports. The volume makes recommendations to establish effective safeguarding mechanisms against maltreatment in service-provision and improve the quality of supports provided to people with disability, with a specific focus on community engagement and participation.

Note: at the time of preparing the first version of this report, there is a review into the NDIS Practice Standards (**the Review**) currently underway. The coverage of the Review, and any subsequent outcomes, may impact several recommendations in Volume 10. However, it is too early to tell how the Review will change the implementation progress of these recommendations.

Recommendation 10.1: Embedding human rights

Responsibility: Australian, state and territory governments

Response: Accept in principle

Update: No update

Recommendation 10.1 calls for the NDIS Quality and Safeguards Commission to develop a program aimed at building the capacity of NDIS service providers and educating service providers on how to embed human rights in the design and delivery of services. There appears to be no update on the implementation of this recommendation.

Recommendation 10.2: Independent support coordination

Responsibility: Australian, state and territory governments

Response: Accept in principle

Update: Beginning stages

Recommendation 10.2 calls for the Minister for the NDIS to create or amend a NDIS Rule that clearly states it is not appropriate for support coordinators to also provide other funded supports. In response, the National Interim Update 2024 report states the NDIA commenced a 'Conflicts of Interest in the NDIS provider market campaign' with the aim to "educate" participants on conflicts of interest, and "remind" NDIS providers of their responsibilities¹¹³. Furthermore, the DRC Progress Report 2025 describes the NDIS is undertaking a review of

NDIS Rules and practice standards, and the NDIS Commission has commenced an investigative inquiry into support coordination and plan management¹¹⁴. At this stage, the outcome of the reviews and inquiry have not been made public, and there is no information on how the NDIS intends to ensure support coordinators are prohibited from providing funded supports.

Recommendation 10.3: Adequate support coordination

Responsibility: Australian Government

Response: Accept

Update: No update

Recommendation 10.3 recommends the NDIA ensure NDIS participants who are identified as being at greater risk of violence, abuse, neglect, or exploitation, including people who living in supported accommodation, must have funding for support coordination in their NDIS plans.

The DRC Progress Report 2025 refers to the *National Disability Insurance Scheme Amendment Act 2024*, advising it enables a better and more flexible way for planning in line with this recommendation¹¹⁵. However, QIDAN note that if the Australian Government is referring to the I-CAN tool. There has been a significant amount of negative feedback received about the I-CAN tool¹¹⁶ and concerns have been raised by professionals regarding its effectiveness¹¹⁷. Given the current public consultation on new framework planning, QIDAN is hopeful of improvement to the framework¹¹⁸. Until we know more about what tool the government is referring to, and whether it will actually provide funding for support coordination for the groups of people identified in this recommendation, there are no updates on its implementation.

Recommendation 10.4: Quality of support coordination

Responsibility: Australian, state and territory governments

Response: Accept in principle

Update: In progress

Recommendation 10.4 refers to quality support coordination and recommends the NDIS Quality and Safeguards Commission examine the practices and process of support coordination, with particular focus on support coordination provided to participants who may be at greater risk of maltreatment (i.e. people living in remote communities, or people experiencing housing insecurity). The NDIS Quality and Safeguards Commission subsequently

undertook an Own Motion Inquiry into support coordination¹¹⁹. The DRC Progress Report 2025 also mentions the NDIS Commission consulted on mandatory registration, including support coordinators.

Recommendation 10.5: Advocacy

Responsibility: Australian Government

Response: Accept in principle

Update: No updates

Recommendation 10.5 recommends developing a NDIS program connecting participants who live in supported accommodation with independent advocacy organisations and programs. The DRC Progress Report 2025 provides multiple updates about how advocacy will be promoted¹²⁰. However, as there was no mention of the program described in recommendation 10.5, there is no update on the implementation of this recommendation.

Recommendations 10.6 – 10.7: Supported decision-making and guidance in disability services

Responsibility: Australian Government

Response: Accept in principle

Update: No update

Both recommendations 10.6 and 10.7 regard improving supported decision-making practices and increasing choice and control in NDIS service delivery. The NDIS Supported Decision Making Implementation Plan (**the Plan**) provides a framework for supported decision-making in-service delivery. However, at this stage, the Plan has not been amended to reflect a participant's right to supported decision making¹²¹. Also worth noting is the Australian Government's additional comments made in the National Interim Update report, where they state that the NDIS Commission has developed a set of e-learning modules to improve capacity of direct support workers to deliver "high quality positive behaviour supports...[focussing] on improving the quality of life of NDIS participants and supporting the reduction and elimination of the use of restrictive practices"¹²². QIDAN note, although it seems the modules will be beneficial for support workers, they are not relevant to the recommendations about supported decision making.

Recommendation 10.8: A national disability support worker registration scheme

Responsibility: Australian Government

Response: Subject to further consideration

Update: Beginning stages

Recommendation 10.8 proposes the establishment of a national disability support worker registration scheme. A NDIS Provider and Worker Registration Taskforce was established in February 2024 and provided recommendations to the NDIS about the proposed registration scheme¹²³. However, it doesn't appear the recommendations made by the taskforce have been implemented yet.

Recommendation 10.9: The Social, Community, Home Care and Disability Services Industry Award

Responsibility: Australian Government

Response: Note

Update: No update

Recommendation 10.9 recommends the Social, Community, Home Care and Disability Services Industry (**SCHADS**) Award be varied to ensure equal remuneration of workers for work equal or comparable in value, with the aim to attract more workers. The Fair Work Commission has proposed radical changes to the SCHADS Award, which will effectively reduce the wages of disability and community services workers significantly. The intent of the recommendation has not been met.

Recommendation 10.10: Provider of last resort

Responsibility: Australian, state and territory governments

Response: Accept in principle

Update: Beginning stages

Recommendation 10.10 urgently asks the Australian Government to engage with states and territories to arrange funding for a 'provider of last resort scheme', in consultation with people with disability and relevant organisations and bodies. According to the DRC Progress Report 2025, a "desktop analysis" has been completed to understand the policy landscape and key considerations. Exploration of possible approaches to address failed or thin markets and participants most at risk¹²⁴.

Recommendation 10.11: Internal procedures for monitoring reportable incidents

Responsibility: Australian Governments

Response: Accept in principle

Update: Beginning stages

Recommendation 10.11 asks the NDIS Quality and Safeguards Commission to improve its procedures for monitoring of reportable incidents, with a particular focus on improving transparency and communication. The NDIS Practice Standards Review will include reviewing Reportable Incidents and Complaints¹²⁵, however, the results from this review are yet to be seen. The Data and Regulatory Transformation Program will be releasing a new Provider Portal in 2026¹²⁶, hopefully addressing part (c) of this recommendation.

Recommendation 10.12: Introduction of class or kind determinations

Responsibility: Australian, state and territory governments

Response: Accept in principle

Update: No update

Recommendation 10.12 recommends the introduction of class or kind determinations, which would effectively exempt certain NDIS providers from notifying the NDIS Quality and Safeguards Commission of “less serious” reportable incidents. The NDIS Practice Standards Review will potentially consider this recommendation.

Recommendation 10.13: Creating an independent investigators panel

Responsibility: Australian Government

Response: Accept in principle

Update: No updates

Recommendation 10.13 requests the NDIS Quality and Safeguards Commission establish a panel of independent investigators to improve safeguarding outcomes. Work on this recommendation has yet to begin.

Recommendation 10.14: Developing model policies and procedures

Responsibility: Australian Government

Response: Accept in principle

Update: No updates

Recommendation 10.14 recommends the NDIS Quality and Safeguards Commission develop and establish “model” policy and procedures aimed to clearly define what incidents must be reported, how reportable incidents are reviewed, improve the person-centred approaches to complaints and increase the capacity of frontline and other workers. The NDIS Practice Standards Review will potentially consider this recommendation.

Recommendation 10.15: Complaint handling and investigative practice guideline

Responsibility: Australian, state and territory governments

Response: Accept in principle

Update: No updates

Recommendation 10.15 asks the NDIS Quality and Safeguards Commission to establish a clear guideline on accessible complaint handling and investigative practice. It also recommends the NDIS Minister amend the National Disability Insurance Scheme Rules 2018 in recognition of the proposed guidelines. In response to this recommendation, the National Interim Update 2024 report proposes future legislative reform would strengthen the NDIS Quality and Safeguards Commission’s powers to safeguard participants, but there are no updates on whether the amendments are underway¹²⁷.

Recommendation 10.16: Requirement to consider redress

Responsibility: Australian, state and territory governments

Response: Accept in principle

Update: No updates

Recommendation 10.16 recommends the that the NDIS, alongside state and territory governments, should consider providing redress and support to NDIS participants in situations where the NDIS Quality and Safeguards Commission has found the service provider bears responsibility for violence, abuse, neglect and/or exploitation experienced by the NDIS participant. There are no updates on this recommendation.

Recommendation 10.17: Access to safeguarding indicators and expertise

Responsibility: Australian Government

Response: Accept in principle

Update: No updates

Recommendation 10.17 asks for the development of guidance around best practice Government models for NDIS providers. QIDAN found no updates on this recommendation.

Recommendation 10.18: Improved complaint handling procedures and responses

Responsibility: Australian Government

Response: Accept in principle

Update: Beginning stages

Recommendation 10.18 suggests the NDIS Quality and Safeguards Commission improve complaint handling policy, ensuring that procedures are clear, streamlined, and transparent. According to the Government's initial response, the NDIS Quality and Safeguards Commission has established the National Intake and Early Resolution team which focusses on complaints management and early resolution of "less complex" complaints. Additionally, the Safeguarding Team was established to identify and mitigate risks. The Australian Government also mentions there is further work currently undertaken to develop a revised complaints process. The DRC Progress Report 2025 credited this work with the Enterprise Prioritisation Models work. There is no update available on this activity and reviewing the NDIS Commissions complaints model does not yet align with this recommendation.

Recommendation 10.19: Requirement to investigate certain complaints

Responsibility: Australian, state and territory governments

Response: Accept in principle

Update: No updates

Recommendation 10.19 recommends the NDIS Minister amend *National Disability Insurance Scheme (Complaints Management and Resolution) Rules 2018 (Cth)* to empower the NDIS Quality and Safeguards Commission to ensure service providers appropriately investigate complaints and report findings of the investigation to the complainants. Unfortunately, there are no updates on this recommendation.

Recommendation 10.20: Making complaint processes accessible

Responsibility: Australian Government

Response: Accept

Update: In Progress

Recommendation 10.20 asks the NDIS Quality and Safeguards Commission to improve the accessibility of its complaint handling process. According to the Australian Government's initial response to this recommendation, the NDIA is reviewing the NDIS website, revising complaints management frameworks, and has developed a webpage outlining the role of independent advocacy. The website review has since been completed and implemented.

Recommendation 10.21: Registration and audit process

Responsibility: Australian, state and territory governments

Response: Accept in principle

Update: Beginning stages

Recommendation 10.21 calls for worker registration, further recommending that registration processes should be audited. It also asks the Minister for the NDIS to amend the *National Disability Insurance Scheme (Protection and Disclosure of Information — Commissioner) Rules 2018* (Cth) to clarify the NDIS Commission can share relevant information with quality auditors. In 2024, the NDIS Provider and Worker Registration Taskforce was established and has since provided advice to the Government on new regulatory arrangements on worker registration¹²⁸. This Taskforce has since been disbanded and provided advice to the Australian Government, this advice is still being considered¹²⁹.

Recommendation 10.22: Strengthened regulatory requirements

Responsibility: Australian, state and territory governments

Response: Accept in principle

Update: No updates

Recommendation 10.22 calls for the strengthening of regulatory requirements by amending NDIS Rules and Guidelines to better address complaint handling and incident management and requirements. There are no updates on the implementation of this recommendation.

Recommendation 10.23: Publishing data about the unregistered provider market

Responsibility: Australian Government

Response: Accept

Update: Beginning stages

Recommendation 10.23 recommends regular and transparent publishing of data about the unregistered provider market. The NDIS Commission's Data and Regulatory Transformation Project are said to increase the Commission's capacity to collect and report on data, and the Commission's Data and Regulatory Transformation Project are also expected to provide advice to Government on data. The DRC Progress Report 2025 also mentions the development of a Data Quality Framework and a Public Sharing of Data policy ¹³⁰.

Recommendation 10.24: Improved access to behaviour support practitioners

Responsibility: Australian Government

Response: Accept in principle

Update: Beginning stages

Recommendation 10.24 asks the NDIS Quality and Safeguards Commission to improve access to behaviour supports practitioners through incentives, partnerships, and professional development. The DRC Progress Report 2025 announced an external review of the Positive Behaviour Support Capability Framework has begun, with the aim to deliver a five-year roadmap to uplift skills and capabilities ¹³¹.

Recommendation 10.25: Strengthened monitoring, compliance and enforcement

Responsibility: Australian Government

Response: Accept in principle

Update: In progress

Recommendation 10.25 calls for the NDIS Quality and Safeguards Commission to review and strengthen its compliance and enforcement policy. The DRC Progress Report 2025 claims this recommendation is completed, stating the 'Fraud Fusion Taskforce' commenced in 2024 which has strengthen compliance actions within the NDIS Quality and Safeguards Commission. The Progress Report also talks about various resources and workshops have been offered to participants about participant's rights¹³². QIDAN acknowledge the NDIS Quality

and Safeguards Commission is taking action to respond to fraud better. However, the NDIS Commission has not adequately improved its compliance and enforcement activities as described within recommendation 10.25. Furthermore, in a recent independent review of the Effectiveness of the NDIS Quality and Safeguards Commission's regulatory functions prepared by the Australian National Audit Office found the Commission "does not have risk responsive and proportionate monitoring, compliance and enforcement activities"¹³³.

Recommendation 10.26: Expanded data reporting and publication

Responsibility: Australian, state and territory governments

Response: Accept in principle

Update: Beginning stages

Recommendation 10.26 asks the NDIS Quality and Safeguards commission expand the data it publishes to include information like data relating to complaints and reportable incidents, and systematic trends identified in data. The DRC Progress Report 2025 includes multiple updates on this recommendation. The Data and Regulatory Transformation project is intended to improve published data however any outcomes of this project are yet to be seen.

Recommendation 10.27: Strengthened intelligence capacity

Responsibility: Australian Government

Response: Accept in principle

Update: Implemented

Recommendation 10.27 recommends a dedicated intelligence unit be established within the NDIS Quality and Safeguards Commission to identify and respond to higher risk participants and take action against problem service providers accordingly. It also recommends the intelligence unit further uses its findings to identify systemic issues with service providers. DRC Progress Report 2025 claims this recommendation is completed, stating the NDIS Commission established a 'Risk, Intelligence and Delivery Team' in 2023, which supports the NDIS Commission to collect intelligence and support the identification of high-risk participants". It goes on to say the NDIS plays a key role in disrupting fraudulent activity.

Recommendation 10.28: Information sharing between prescribed bodies

Responsibility: Australian, state and territory governments

Response: Accept in principle

Update: No updates

Recommendation 10.28 proposes the NDIS, alongside states and territory governments, should introduce legislative and administrative arrangements to improve the exchange of information between the NDIS Quality and Safeguards Commission and other bodies. The NDIS and governments are yet to directly address this recommendation.

Recommendation 10.29: Establishing a First Nations Unit

Responsibility: Australian

Response: Accept in principle

Update: In progress

Recommendation 10.29 calls for the NDIS Quality and Safeguards Commission to establish a 'First Nations Unit', with the aim of strengthening the NDIS' understanding of systemic issues and barriers faced by First Nations participants. In the DRC Progress Report 2025 the Australian Government considered this recommendation completed. However, their Indigenous and Remote Operations team don't currently align with the 'First Nations Unit' described in recommendation 10.29. There is currently no information on how the NDIS Quality and Safeguards Commission intends to track and address systemic issues experienced by First Nations participants. The establishment of the Indigenous and Remote Operations team is a positive step; however, improvements can be made to fully implement this recommendation.

Recommendation 10.30: Engagement and capacity building activities

Responsibility: Australian Government

Response: Accept in principle

Update: Beginning stages

Recommendation 10.30 recommends the NDIS Quality and Safeguards Commission improve engagement and capacity building activities with NDIS service providers. In response, the Australian Government has claimed that the Commission currently shares data and is

currently offering training¹³⁴. However, this only addresses part of the recommendation, and the Australian Government fail to provide updates on all aspects of recommendation 10.30.

Recommendation 10.31: Continuous monitoring of criminal charges

Responsibility: Australian Government, States and Territories

Response: Accept in principle

Update: Beginning stages

Recommendation 10.31 asks governments to amend the Intergovernmental Agreement on Nationally Consistent Worker Screening for the National Disability Insurance Scheme to clarify the role of the Australian Federal Police in monitoring new charges. Governments are currently progressing an implementation plan for expanding the continuous monitoring capability to include Commonwealth offences¹³⁵.

Recommendation 10.32: Operational framework to guide worker screening

Responsibility: Australian Government, States and Territories

Response: Accept in principle

Update: Beginning stages

Recommendation 10.31 asks the NDIS Commission to consult with state and territory worker screening units to develop a framework to guide provision of information to worker screening units. The DRC Progress Report 2025 refers to enhancing monitoring fields to support more detailed information sharing¹³⁶.

Recommendation 10.33: Reviewing information sharing arrangements

Responsibility: Australian Government, States and Territories

Response: Accept in principle

Update: No update

Recommendation 10.33 asks for the NDIS worker screening review, Australian, State and Territory governments to consider the adequacy of information sharing arrangements. Governments are yet to directly address implementing this recommendation.

Volume 11: Independent oversight and complaint mechanisms

Whilst Volume 10 focussed on service provision and the risk of maltreatment faced by many people with disability accessing NDIS services and supports, Volume 11 expands its review into all systems, making recommendations to establish and strengthen independent oversight, complaints and safeguarding mechanisms Nationwide. Volume 11 highlights the need to establish specific adults safeguarding functions and National complaints processes and improve existing safeguarding systems and instruments. Significantly, recommendations are made to strengthen the use of the Optional Protocol to the Convention Against Torture in Australia.

Recommendation 11.1: Nationally consistent adult safeguarding functions

Responsibility: Australian, state and territory governments

Response: Subject to further consideration

Update: No update

Recommendation 11.1 recommends different measures to achieve nationally consistent adult safeguarding functions, including introducing legislation establishing consistent safeguarding functions, ensuring the functions are operated by independent statutory bodies, and are also operated under a proposed National Adult Safeguarding Framework. Though the Australian Government announced an investment of \$15.6 million into a Quality and Safeguarding Framework and Disability Support Ecosystem Safeguarding Strategy¹³⁷, there is currently no updates publicly available on these strategies, nor whether they meet the intent of this recommendation.

Recommendation 11.2: An integrated national adult safeguarding framework

Responsibility: Australian, State and territory government

Response: Subject to further consideration

Update: No update

Recommendation 11.2 asks the Australian Government to incorporate the National Adult Safeguarding Framework into the Safety Targeted Action Plan within Australia's Disability Strategy. The Commonwealth continues to progress the Quality and Safeguarding Framework and Disability Support Ecosystem Safeguarding Strategy as mentioned in recommendation

11.1. However, there is currently no updates publicly available on these strategies, nor whether they meet the intent of this recommendation.

Recommendation 11.3: 'One-stop shop' complaint reporting, referral and support

Responsibility: State and territory governments

Response: Accept in principle

Update: No update

Recommendation 11.3 proposed that each state and territory establish independent 'one-stop shop' complaint reporting, referral and support mechanisms for people with disability to report experiences of violence, abuse, neglect and exploitation. The Queensland Government continues to consider this recommendation in collaboration with the Australian Government and other states and territories despite other states varied progress¹³⁸.

Recommendation 11.4: Creating accessible complaint pathways

Responsibility: Australian, state and territory governments

Response: Accept in principle

Update: No updates

Recommendation 11.4 asks the Australian Government to establish a national complaints pathway to direct people to the independent complaint and referral mechanism described in recommendation 11.3 in their state or territory. There has been no progress on 11.3 or 11.4 for Queensland.

Recommendation 11.5: Complaint handling and investigative practice guidelines

Responsibility: Australian, state and territory governments

Response: Accept in principle

Update: No updates

Recommendation 11.5 calls for the co-designed development of a complaints handling system for people with disability which is to be implemented by the NDIS Quality and Safeguards Commission, state ombudsman, and other bodies who are involved in complaints management. Whilst the Commonwealth Ombudsman is considering how to advance this work¹³⁹ there are no clear meaningful updates on next steps or timeframes.

Recommendation 11.6: Enshrining key provisions of OPCAT in legislation

Responsibility: Australian Government

Response: Accept in principle

Update: No updates

Recommendation 11.6 asks the Australian Government to introduce national legislation enshrining the Optional Protocol to the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (**OPCAT**), and coordinate Australia's response to the OPCAT. Whilst the Australian Government states it continues to work with states and territories on OPCAT implementation¹⁴⁰ there is no transparency on what this entails. Given the history of delays, extensions and alleged non-compliance¹⁴¹ since ratification of the OPCAT in 2017, QIDAN are concerned with the lack of ongoing progress. Queensland are one of three states (New South Wales, Queensland and Victoria) yet to nominate a National Preventative Mechanism further delaying implementation in Queensland.

Recommendation 11.7: Resourcing and wider definition of places of detention

Responsibility: Australian, state and territory governments

Response: Accept in principle/subject to further consideration

Update: No updates

Recommendation 11.7 recommends all governments agree to resource National Preventive Mechanism bodies to fulfil the Optional Protocol to the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (**OPCAT**) core functions, whilst also broadening the definition of 'places of detention' to ensure the National Preventive Mechanism bodies are able to fulfil their responsibilities in all places where people with disability are at risk of having their liberty deprived. In its initial response to the recommendation, the Queensland Government acknowledges the value of enabling National Preventive Mechanism bodies to fulfil their core functions in all places of detention, but the Queensland's Government's role in delivering this outcome was subject to receiving funding from the Commonwealth. Queensland are one of three states (New South Wales, Queensland and Victoria) yet to nominate a National Preventative Mechanism further delaying implementation in Queensland.

Recommendations 11.8 – 11.9: Legislate and Designate National Preventive Mechanisms

Responsibility: State and territory governments

Response: Subject to further consideration

Update: No updates

Recommendations 11.8 to 11.9 regard legislating the establishment and designation of National Preventive Mechanism bodies. At this point, Queensland is yet to nominate Preventative Mechanism bodies in the state, and there continues to be disagreements between Federal and State and Territory Governments about who will pay for the Optional Protocol to the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment of Punishment (**OPCAT**).

Recommendation 11.10: Improved consistency and coordination

Responsibility: Australian Government

Response: Accept in Principle

Update: No updates

Recommendation 11.10 is directed toward the Commonwealth Ombudsman, recommending as the coordinator of the National Preventive Mechanism Network, the Commonwealth Ombudsman lead the Network's response to people with disability in places of detention. For instance, leading the Network to develop common disability inspection standards to be used in all jurisdictions, and to prioritise the inspections of places of detention posing high risk to people with disability. Unfortunately, there are no updates on this recommendation.

Recommendation 11.11: Disability inclusive approach to implementing OPCAT

Responsibility: Australian, state and territory governments

Response: Accept in principle/subject to further consideration

Update: No updates

Recommendation 11.11 describes how National Preventive Mechanisms across Australia can take a disability-inclusive approach to the implementation of the Optional Protocol to the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment of Punishment (**OPCAT**). As mentioned above, Queensland has not nominated a National Preventive Mechanism body. Furthermore, there is no information about disability-inclusive actions taken by existing National Preventive Mechanisms.

Recommendation 11.12: Nationally consistent community visitor schemes

Responsibility: Australian, state and territory governments

Response: Accept in principle

Update: Beginning stages

Recommendation 11.12 makes suggestions to strengthen community visitor schemes (**CVS**) across Australia, including by improving the national consistency of CVS. The Australian Government committed \$4.4 million in funding to drive a nationally consistent CVS, and between September and August 2025, the Department of Health, Disability, and Ageing held consultation seeking the views of people with disability about CVS. At this point, there are no outcomes of the consultation available.

Recommendation 11.13: Integration of community visitor schemes with the NDIS

Responsibility: Australian, state and territory governments

Response: Accepted in principle

Update: No updates

Recommendation 11.13 recommends the *National Disability Insurance Scheme Act 2013* (Cth) be amended to formally recognise community visitor schemes (**CVS**) as a safeguard, and to provide a legislative framework authorising information sharing between the NDIS Quality and Safeguards Commission and CVS. Though it appears this subject was raised in the consultation about CVS facilitated by the Department of Health, Disability, and Ageing¹⁴², there are no meaningful updates on this recommendation.

Recommendations 11.14 – 11.16: Establishment of disability death review schemes

Responsibility: State and territory governments

Response: Subject to further consideration

Update: No updates

Recommendations 11.14 to 11.16 regard the establishment of disability death review schemes in each state and territory, to be underpinned by a national agreement on disability death reviews. Both the Australian Government and the Queensland Government stated in their initial responses to these recommendations they acknowledge the value of death review scheme in identifying the factors contributing to the deaths of people with disability. However,

each recommendation was subject to further consideration and there are no meaningful updates on these recommendations.

Recommendation 11.17: Nationally consistent reportable conduct scheme

Responsibility: State and territory governments

Response: Accept in principle

Update: In progress

Recommendation 11.17 sets out how states and territories can harmonise and strengthen reportable conduct schemes, including recommendations to introduce or amend existing legislation to ensure disability service providers who support children with disability are included in reportable conduct scheme, and adding 'ill-treatment' into definitions of reportable conduct. In June 2024, the Queensland Government introduced the *Child Safe Organisation Bill 2024* to establish a framework for nationally consistent reportable conduct scheme within Queensland, also adding the term 'ill-treatment' into state-used definitions. In the DRC Progress Report 2025 the Queensland Government considered part (c) partly complete with an update to the reportable conduct scheme to commence from 1 July 2026¹⁴³.

Recommendation 11.18: Dual oversight of reportable conduct and incidents

Responsibility: Australian, state and territory governments

Response: Accept in principle

Update: No update

Recommendation 11.18 recommends that reportable scheme operators and the NDIS Quality and Safeguards Commission should develop guiding principles and guidance material on the effective handling of reportable incidents. The DRC Progress Report 2025 stated the NDIS Practice Standards review will consider these recommendations¹⁴⁴. However, in Queensland, The Queensland Family and Child Commission is responsible for the administration of reportable conduct scheme. There is no information available on whether the Queensland Family and Child Commission has worked with the NDIS Quality and Safeguards Commission to develop shared guiding principles.

Volume 12: Beyond the Royal Commission

Volume 12 focuses on the implementation of the DRC findings and recommendations, setting out expectations and suggestions for mechanisms to monitor, report on and evaluate actions taken by governments in response to the DRC. All recommendations made in Volume 12 are targeted at the Australian Government, with some also targeted at state and territory governments. It is clear volume 12 is focused on independent and disability-led oversight of the DRC implementation, strong accountability, and effective outcomes for Australians with disability. The necessity of this analysis shows

Recommendation 12.1: Government responses to the Final report

Responsibility: Australian, state and territory governments

Response: Accept in principle

Update: Implemented

Recommendation 12.1 calls for the Australian and state and territory Governments to publish initial responses to the DRC's Final Report by March 2024. Responses were expected to include a plan for how the recommendation would be implemented, justification for any rejections, and timeframes. The Australian and Queensland Governments responses released in December 2024 were very late and did not provide comprehensive plans for how the recommendations would be implemented or any concrete timeframes. There was also no adequate justification provided for rejected recommendations.

Recommendation 12.2: Implementation of the Final report recommendations

Responsibility: Australian, state and territory governments

Response: Accept in principle

Update: Implemented

Recommendations 12.2 regards the implementation of the DRC's recommendations, recommending the Disability Reform Ministerial Council oversee the implementation as a priority. Though the Communiqués published by the Disability Reform Ministerial Council are infrequent and provide very little information on the Council's work to implementing the DRC, the stated purpose of the Council is to coordinate and lead disability reform (including the DRC).

Recommendation 12.3: Progress reporting on implementation of recommendations

Responsibility: Australian, state and territory governments

Response: Accept in principle

Update: No updates

Recommendation 12.3 recommends the National Disability Commission table an annual report on the progress of the implementation of the DRC. As mentioned in response to recommendation 5.5, the National Disability Commission has not been established. In the DRC Progress Report 2025 the Disability Reform Ministerial Council is credited with beginning to implement this¹⁴⁵, however this recommendation will never be implemented without the National Disability Commission.

Recommendation 12.4: Evaluation of effectiveness in improving outcomes

Responsibility: Australian Government

Response: Accept in principle

Update: No updates

Recommendation 12.4 asks the National Disability Commission to lead independent evaluations of the implementation of the DRC recommendations, which should include evaluation of their effectiveness in improving outcomes for Australians with disability. As previously mentioned, the National Disability Commission has not been established, and there doesn't appear to be another independent body evaluating the implementation of the DRC.

Recommendations 12.5 – 12.7: Improving the collection of disability data

Responsibility: Australian, state and territory governments

Response: Accept in Principle

Update: Beginning stages

Recommendations 12.5 to 12.7 regard nationally consistent and strengthened approaches to disability-related data collection. The DRC Progress Report 2025 provided updates on these recommendations. Updates to questions for collecting data and development of disability indicators to support consistent inclusion and description of disability in data¹⁴⁶. However, reports with key findings are yet to be released.

Recommendation 12.8: Long-term support for the National Disability Data Asset

Responsibility: Australian, state and territory governments

Response: Accept in principle

Update: No update

Recommendation 12.8 recommends the Australian and state and territory Governments, with the Disability Reform Ministerial Council, should commit to long-term support of the National Disability Data Asset (**NDDA**). This includes financial support with funding, a commitment to publishing annual data, and commencing specific data projects through the NDDA. Although the NDDA still functions there is yet to be a long-term commitment.

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