

Analysis of Volume 7(a) of the Implementation of the DRC



Artwork by artist with disability, Hayley Marrs, titled **Galaxy of 'Stars' and 'Moons'**.

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

The cover artwork, titled "Galaxy of stars and moons", was created by Hayley Marrs. Artist Statement: My artwork represents a circle of 'stars' and 'moons', reflecting the various learners in every classroom. To me, inclusivity is having access to the learning, friendship and classroom experiences that suit each individual best, and the acceptance that our differences are what make our galaxy so beautiful.

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.

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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 certification¹⁰
- Learning equity¹¹
- Student attendance¹².

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 disability¹³. The Australian Government is currently in the middle of a

scheduled review of the *Disability Standards for Education 2005* ¹⁴. 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](#) ¹⁵, 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 Queensland ¹⁶. The Queensland Government has further advised these schools will mostly be co-located with mainstream schools in line with the DRC ¹⁷. 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 schools ¹⁸. 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 provided¹⁹.

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 communications²⁰. 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 2025-2028²¹ 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 2025²².

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 Agenda²³. 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 Education²⁴. 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 Plan²⁵, 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 2025²⁶. 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”²⁷. 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.”²⁸ 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.

References

- ¹ Disability Reform Ministerial Council. (2024). *Disability reform roadmap for 2024 and 2025*. https://www.health.gov.au/sites/default/files/2025-07/disability-reform-roadmap_0.pdf
- ² Australian Government Department of Health, Disability and Ageing. (2024). *National interim update 2024*. <https://www.health.gov.au/sites/default/files/2025-07/national-interim-update-2024-easy-read.pdf>
- ³ Ibid, (pp,2)
- ⁴ Disability Reform Ministerial Council. (June 2025). *Disability reform ministerial council (DRMC) Adelaide – 6 June 2025 Communiqué*. <https://www.health.gov.au/sites/default/files/2025-07/drmc-communique-6-june-2025.pdf>
- ⁵ Australian Government Department of Health, Disability and Ageing. (November 2025). *Disability Royal Commission Progress Report 2025*. <https://www.health.gov.au/resources/publications/disability-royal-commission-progress-report-2025/volume-4-realising-the-human-rights-of-people-with-disability/recommendations-423-to-434-disability-discrimination-reform>
- ⁶ Queensland Government. (2025). *Queensland Government Response to the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability*. https://www.families.qld.gov.au/_media/documents/disability/disability-royal-commission/qld-govt-response-disability-royal-commission.pdf
- ⁷ Queensland Government. (2024). *Queensland Government response to the Disability Royal Commission* (pp, 100). <https://www.health.gov.au/sites/default/files/2025-11/original-queensland-government-response-to-the-disability-royal-commission.pdf>
- ⁸ Queensland Government. (2025). *Queensland Government Response to the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability* (pp, 92). https://www.families.qld.gov.au/_media/documents/disability/disability-royal-commission/qld-govt-response-disability-royal-commission.pdf
- ⁹ Ibid (pp, 98)
- ¹⁰ Australian Government. (2025). *Better and Fairer Schools Agreement – Full and Fair Funding 2025-2034*. Pp. (15). <https://www.education.gov.au/download/18932/heads-agreement-better-and-fairer-schools-agreement-full-and-fair-funding-2025-2034/43292/document/pdf>
- ¹¹ Ibid, (pp,16)
- ¹² Ibid, (pp, 17)
- ¹³ Queensland Government. (2025) *Question on notice* (No. 903). <https://documents.parliament.qld.gov.au/tableoffice/questionsanswers/2025/903-2025.pdf>
- ¹⁴ Australian Government Department of Education. (2025). *2025 Review of the Disability Standards for Education-consultation*. <https://www.education.gov.au/disability-standards-education-2005/consultations/2025-review-disability-standards-education-consultation>
- ¹⁵ Queensland Government Department of Education. (2025). *Disability Service Plan 2025-2028* (pp, 8). <https://qed.qld.gov.au/our-publications/strategiesandplans/Documents/disability-service-plan.pdf>
- ¹⁶ Queensland Government Department of Education. (2025). *School Upgrades*. <https://alt-qed.qed.qld.gov.au/programs-initiatives/department/building-education/major-projects/school-upgrades>
- ¹⁷ Queensland Government. (2025). *Queensland's largest special school delivery on track*. <https://statements.qld.gov.au/statements/103771>
- ¹⁸ Australian Government Department of Health, Disability and Ageing. (November 2025). *Disability Royal Commission progress report 2025 – recommendation 7.4*. Australian Government Department of Health, Disability and Ageing. (November 2025). *Disability Royal Commission progress report 2025 – recommendation 7.4*. <https://www.health.gov.au/resources/publications/disability-royal-commission-progress-report-2025/volume-7-inclusive-education-employment-and-housing/recommendation-74-participation-in-school-communities>
- ¹⁹ Ibid
- ²⁰ Queensland Government Department of Education. (2025). *Disability Service Plan 2025-2028* (pp, 11). <https://qed.qld.gov.au/our-publications/strategiesandplans/Documents/disability-service-plan.pdf>
- ²¹ Queensland Government Department of Education. (2025). *Disability Service Plan 2025-2028* (pp, 11). <https://qed.qld.gov.au/our-publications/strategiesandplans/Documents/disability-service-plan.pdf>

²² Australian Institute for Teaching and School Leadership. (2025). *Addendum to accreditation standards and procedures* (pp, 12). <https://www.aitsl.edu.au/docs/default-source/national-policy-framework/addendum-to-accreditation-standards-and-procedures.pdf>

²³ Australian Government Department of Health, Disability and Ageing. (November 2025). *Disability Royal Commission progress report 2025 - recommendation 7.9*. <https://www.health.gov.au/resources/publications/disability-royal-commission-progress-report-2025/volume-7-inclusive-education-employment-and-housing/recommendation-79-data-evidence-and-building-best-practice>

²⁴ Queensland Government Policy and Procedure Register. (2025). *Complaints and grievances management policy*. <https://ppr.qed.qld.gov.au/pp/complaints-and-grievances-management-policy>

²⁵ Queensland Government Education. (2025). *Red tape reduction in Queensland state schools*. <https://education.qld.gov.au/initiatives-and-strategies/strategies-and-programs/red-tape-reduction>

²⁶ Australian Government Department of Health, Disability and Ageing. (November 2025). *Disability Royal Commission progress report 2025 - recommendation 7.13*. <https://www.health.gov.au/resources/publications/disability-royal-commission-progress-report-2025/volume-7-inclusive-education-employment-and-housing/recommendation-713-national-roadmap-to-inclusive-education>

²⁷ Queensland Government. (2025). *Queensland's largest special school delivery on track*. <https://statements.qld.gov.au/statements/103771>

²⁸ United Nations. (2016). *UN Committee on the Rights of Persons with Disabilities*.