

(Needs new art) Analysis of Volume 10 of the Implementation of the DRC



Artwork by artist with disability, Hayley Marrs

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 was created by Hayley Marrs using pens and markers.

Hayley says:

" My artwork represents how the world can be too loud, too bright, and too fast. The black hole of the unknown in my artwork is about how we don't know what is happening to our disability supports. Support for people with disabilities is more and more limited; this support once improved how we got through each day.

It's hard not being able to see the person telling us how much funding we get. They need to see how our disability affects us. They don't live our lives, and they don't see the invisible parts of our disability. Without support we are left to struggle to adapt."

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 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 responsibilities¹⁰. 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 management¹¹. 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 recommendation¹². 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 tool¹³ and concerns have been raised by professionals regarding its effectiveness¹⁴. Given the current public consultation on new framework planning, QIDAN is hopeful of improvement to the framework¹⁵. 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 coordination¹⁶. 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 promoted¹⁷. 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 making¹⁸. 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"¹⁹. 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 scheme²⁰. 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 risk²¹.

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 Complaints²², 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 2026²³, 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 underway²⁴.

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 registration²⁵. This Taskforce has since been disbanded and provided advice to the Australian Government, this advice is still being considered²⁶.

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 ²⁷.

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 ²⁸.

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 rights²⁹. 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”³⁰.

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 training³¹. 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 offences ³².

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 sharing³³.

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.

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 Ibid
- ¹¹ 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-10-disability-services/recommendation-102-independent-support-coordination?language=en>
- ¹² Ibid
- ¹³ SBS News. (2025). *Minister urged to 'come clean' on NDIS changes as advocates fear 'degrading' treatment*. <https://www.sbs.com.au/news/article/minister-urged-to-come-clean-on-upcoming-ndis-changes/6rtqr6kj3>
- ¹⁴ Australian Psychological Society. (2025). *APS in the guardian: NDIS tool to determine support not tested on variety of disability types – including diverse autism, experts warn*. <https://psychology.org.au/insights/aps-in-the-guardian-ndis-tool-to-determine-support>
- ¹⁵ Australian Government. (2026). *NDIS rules: Public consultation on new framework planning*. <https://consultations.health.gov.au/ndis/nfp-public-consultation/>
- ¹⁶ <https://www.ndiscommission.gov.au/rules-and-standards/quality-practice/support-coordination-and-plan-management#paragraph-id-8865>
- ¹⁷ Australian Government Department of Health, Disability and Ageing. (November 2025). *Disability Royal Commission progress report 2025 - recommendation 10.5*. <https://www.health.gov.au/resources/publications/disability-royal-commission-progress-report-2025/volume-10-disability-services/recommendation-105-advocacy>
- ¹⁸ NDIS. (Accessed November 2025). *Supported decision making policy*. <https://www.ndis.gov.au/policies/supported-decision-making-policy>
- ¹⁹ 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> – p5
- ²⁰ Australian Government Department of Health, Disability and Ageing. (Accessed November 2025). *NDIS provider and worker registration taskforce*. <https://www.health.gov.au/committees-and-groups/ndis-provider-and-worker-registration-taskforce?language=en>
- ²¹ Australian Government Department of Health, Disability and Ageing. (November 2025). *Disability Royal Commission progress report 2025 - recommendation 10.10*.

<https://www.health.gov.au/resources/publications/disability-royal-commission-progress-report-2025/volume-10-disability-services/recommendation-1010-provider-of-last-resort>

²² Australian Government Department of Health, Disability and Ageing. (November 2025). *Disability Royal Commission progress report 2025 - recommendation 10.11*.

<https://www.health.gov.au/resources/publications/disability-royal-commission-progress-report-2025/volume-10-disability-services/recommendation-1011-internal-procedures-for-monitoring-reportable-incidents>

²³ NDIS Quality and Safeguards Commission. Accessed May 2026. *Digital Transformation*.

<https://www.ndiscommission.gov.au/about-us/digital-transformation>

²⁴ 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>

²⁵ Australian Government Department of Health Disability and Ageing. (2024). *NDIS Provider and Worker Registration Taskforce Advice*. <https://www.health.gov.au/resources/publications/ndis-provider-and-worker-registration-taskforce-advice?language=en>

²⁶ Australian Government Department of Health, Disability and Ageing. (November 2025). *Disability Royal Commission progress report 2025 - recommendation 10.21*.

<https://www.health.gov.au/resources/publications/disability-royal-commission-progress-report-2025/volume-10-disability-services/recommendation-1021-registration-and-audit-process>

²⁷ Australian Government Department of Health, Disability and Ageing. (November 2025). *Disability Royal Commission progress report 2025 - recommendation 10.23*.

<https://www.health.gov.au/resources/publications/disability-royal-commission-progress-report-2025/volume-10-disability-services/recommendation-1023-publishing-data-about-the-unregistered-provider-market>

²⁸ *ibid*

²⁹ *ibid*

³⁰ The Auditor-General. (2025). *Effectiveness of the NDIS Quality and Safeguards Commission's Regulatory Functions*. <https://apo.org.au/sites/default/files/resource-files/2025-09/apo-nid332072.pdf>

³¹ Australian Government Department of Health, Disability and Ageing. (November 2025). *Disability Royal Commission progress report 2025 - recommendation*

10.30. <https://www.health.gov.au/resources/publications/disability-royal-commission-progress-report-2025/volume-10-disability-services/recommendation-1030-engagement-and-capacity-building-activities>

³² Australian Government Department of Health, Disability and Ageing. (November 2025). *Disability Royal Commission progress report 2025 - recommendation 10.31*.

https://www.health.gov.au/resources/publications/disability-royal-commission-progress-report-2025/volume-10-disability-services/recommendation-1031-continuous-monitoring-of-criminal-charges?book_active_tab=content

³³ Australian Government Department of Health, Disability and Ageing. (November 2025). *Disability Royal Commission progress report 2025 - recommendation 10.32*.

<https://www.health.gov.au/resources/publications/disability-royal-commission-progress-report-2025/volume-11-independent-oversight-and-complaint-mechanisms/recommendation-116-enshrining-key-provisions-of-opcat-in-legislation>