

# Analysis of Volume 7(c) of the Implementation of the DRC



Artwork by artist with disability, Levi Diball, Brisbane Outsider Artists (Access Arts)

## 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 Levi Diball of Access Arts.

Levi draws on her own lived experience, using humour and creativity to tell stories about everyday life, family and disability. Through her work, she hopes to build a greater understanding of the experiences of people with disability.

Created for our exploration of Volume 7c on Inclusive Housing, this illustration reminds us that home is more than a place to live.

## 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 2025<sup>1</sup>.

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 recommendations<sup>2</sup>. 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”<sup>3</sup>.

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”<sup>4</sup>. QIDAN believe this is a reference to the first national implementation progress report. This report was not released in August. Then, on the 30<sup>th</sup> 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 recommendation<sup>5</sup>. 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 recommendations<sup>6</sup>. 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”<sup>7</sup>. The response was then altered to remove this sentence<sup>8</sup>.
- 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.<sup>9</sup>

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 7 (c): 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 group<sup>10</sup>. 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 ADS<sup>11</sup>.

### **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)<sup>12</sup>, and 50% of social housing currently being constructed will apparently meet the LHD at gold or platinum level whilst upholding a minimum standard<sup>13</sup>. 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 disability<sup>14</sup>.

### **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 reform<sup>15</sup>, 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 required<sup>16</sup>.

### **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'<sup>17</sup> 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 barriers<sup>18</sup>. 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 reform<sup>19</sup>, 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)<sup>20</sup>. 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 Accommodation<sup>21</sup>, 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"<sup>22</sup>.

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.

## References

<sup>1</sup> 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](https://www.health.gov.au/sites/default/files/2025-07/disability-reform-roadmap_0.pdf)

<sup>2</sup> Australian Government Department of Health, Disability and Ageing. (2024). *National interim update 2024*.

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<sup>3</sup> Ibid, (pp,2)

<sup>4</sup> 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-communicue-6-june-2025.pdf>

<sup>5</sup> 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>

<sup>6</sup> 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](https://www.families.qld.gov.au/_media/documents/disability/disability-royal-commission/qld-govt-response-disability-royal-commission.pdf)

<sup>7</sup> 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>

<sup>8</sup> 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](https://www.families.qld.gov.au/_media/documents/disability/disability-royal-commission/qld-govt-response-disability-royal-commission.pdf)

<sup>9</sup> Ibid (pp, 98)

<sup>10</sup> Federal Financial Relations. (2024). *National Agreement on Social Housing and Homelessness*.

<https://federalfinancialrelations.gov.au/sites/federalfinancialrelations.gov.au/files/2024-06/nashh-final.pdf>

- <sup>11</sup> Australian Government Department of Social Services (2024). *Australia's Disability Strategy 2021-2031* (pp, 21). <https://www.disabilitygateway.gov.au/sites/default/files/documents/2025-01/5831-dss3513-ads-strategy-2021.pdf>
- <sup>12</sup> Queensland Government Department of Housing and Public Works. (2025). *Modern Homes standards*. <https://www.housing.qld.gov.au/initiatives/modern-homes/modern-homes-standards>
- <sup>13</sup> Queensland Government. (2024). *Partnering for inclusive housing with Queenslanders with disability 2024-2027* (pp, 17). [https://www.housing.qld.gov.au/\\_\\_data/assets/pdf\\_file/0028/61957/partnering-for-inclusive-housing-with-queenslanders-with-disability-2024-2027.pdf](https://www.housing.qld.gov.au/__data/assets/pdf_file/0028/61957/partnering-for-inclusive-housing-with-queenslanders-with-disability-2024-2027.pdf)
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- <sup>16</sup> Australian Government Department of Health, Disability and Ageing. (November 2025). *Disability Royal Commission progress report 2025 - recommendation 7.37*. <https://www.health.gov.au/resources/publications/disability-royal-commission-progress-report-2025/volume-7-inclusive-education-employment-and-housing/recommendation-737-increase-tenancy-and-occupancy-protections-for-people-with-disability>
- <sup>17</sup> [www.housing.qld.gov.au/\\_\\_data/assets/pdf\\_file/0028/61957/partnering-for-inclusive-housing-with-queenslanders-with-disability-2024-2027.pdf](https://www.housing.qld.gov.au/__data/assets/pdf_file/0028/61957/partnering-for-inclusive-housing-with-queenslanders-with-disability-2024-2027.pdf)
- <sup>18</sup> Australian Government. (2024). *Australian Government response to the Disability Royal Commission* (pp, 156). <https://www.health.gov.au/sites/default/files/2025-07/australian-government-response-to-the-disability-royal-commission.pdf>
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