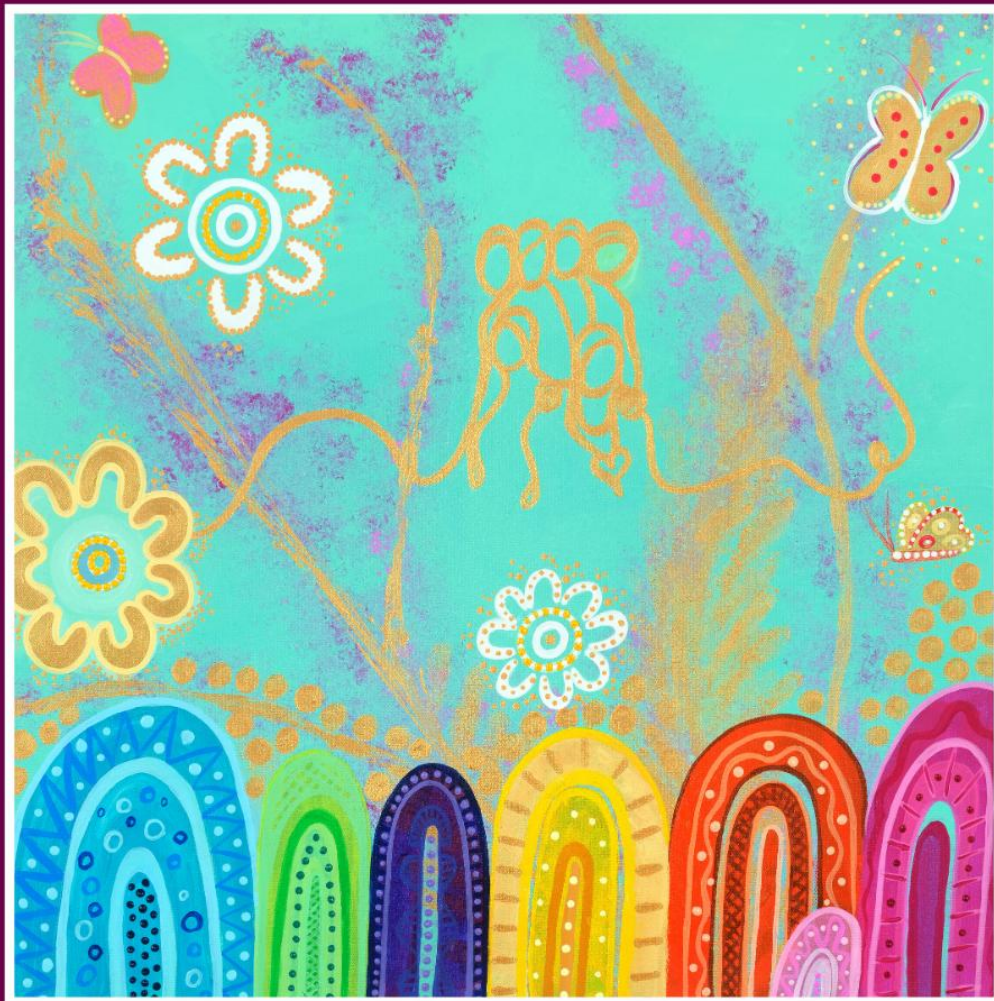




Queensland Independent
Disability Advocacy Network

Analysis of Volume 9 of the Implementation of the DRC



Spirit of Justice

Artwork by First Nations artist with disability, Colleen Sam

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

Artist Statement:

The cover artwork titled "Spirit of Justice" was created by First Nations artist Colleen Sam. The bright vibrant colours depicted in the artwork represents the bright and hopeful future for anyone experiencing massive changes in their lives, be it the individual's personal experiences or their loved ones and people that are close to them and their community. The Mountains at the bottom of the painting represents the trials, obstacles and barriers one must overcome. The butterflies depict hope, faith, spirit and always looking for the beauty in life whilst connection to the spiritual realm is always present. The people in the middle painted by a golden thread connecting them illustrates togetherness, love and respect. It also means leaving your own personal signature on the people you meet from family to friends to the wider community, so let your signature be of high moral values and signed with a gold standard set of principles.

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 9: First Nations peoples with disability

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

Recommendation 9.1: Culturally appropriate parenting capacity assessments

Responsibility: State and territory governments

Response: Accept in principle

Update: No updates

Recommendation 9.1 recommends states and territories work with First Nations leaders in the child protection space to co-design principles and guidelines for parenting capacity assessments for First Nations parents with disability who are engaged in, or at risk of being engaged in, the child safety system. In addition to the DRC, The Public Advocate's 2025 report *Supporting parents with cognitive disability in Queensland: the need for reform*¹⁰ also highlights how First Nations parents are disproportionately disadvantaged by current parenting capacity assessments. Unfortunately, there are no updates on the implementation of this recommendation.

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

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

Responsibility: Australian, state and territory governments

Response: Accept in principle

Update: Beginning stages

Recommendation 9.2 is aimed at ensuring all First Nations children up to the age of five who are exiting out-of-home care are screened using the culturally adapted developmental screening Ages and Stages Questionnaire-Talking about Raising Aboriginal Kids (**ASQ-TRAK**)

tool. The DRC Progress Report 2025 mentions that there is currently a consultation on the use of ASQ-TRAK¹¹.

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

Responsibility: State and territory governments

Response: Accept in principle

Update: Beginning stages

Recommendation 9.3 calls for the review of justice strategies, with the aim of strengthening cultural safety within the criminal punishment system. The First Nations Justice Office within the Department of Justice is currently leading the implementation of this recommendation, beginning with a review of “criminal justice strategies”, with the goal of identifying its own recommendations on how to improve cultural safety within the system¹².

Recommendation 9.4: Expand community connector programs

Responsibility: Australian Government

Response: Accept

Update: Beginning stages

Recommendation 9.4 regards expanding the coverage of the NDIA’s community connector programs for First Nations peoples with disability living in remote communities. This includes providing adequate and long-term funding to deliver the programs. A NDIS draft discussion paper on the NDIS First Nations Market dated 17 October 2025 mentions one of the priority areas of the NDIA to improve the market is to “expand the remote community connector program to recognise providers with extra NDIS-adjacent supports”, and also to create a regional hub network for participants living between remote locations¹³. The DRC Progress Report 2025 mentions an expected expansion from 38 contracts to 50, covering 575 communities with a tendering process currently underway¹⁴.

Recommendation 9.5: Block funding the community-controlled sector

Responsibility: Australian Government

Response: Accept in principle

Update: No update

Recommendation 9.5 recommends the NDIA provide block funding for First Nations Community Controlled organisations to deliver NDIS services and supports. The DRC Progress Report 2025 claims that this recommendation is in progress because the NDIS have contracted the National Aboriginal Community-Controlled Organisation (**NACCHO**) for 18 months, further stating the NACCHO will be working with state and territories on service delivery models “may include models that require block funding arrangement for the Aboriginal Community Controlled Health Sector”¹⁵. Though QIDAN is supportive of the work NACCHO is doing with the NDIA, we do not think that NDIS is clearly and genuinely committed to block funding.

Recommendation 9.6: National Disability Insurance Agency Board

Responsibility: Australian Government

Response: Accept in principle

Update: Implemented

Recommendation 9.6 recommends the *National Disability Insurance Scheme Act 2013* (Cth) be amended to ensure the NDIA Board must include at least one First Nations person at any given time. The Act has been amended, and NDIA is now required to ensure at least one member of the Board other than the Chair is an Indigenous person¹⁶.

Recommendation 9.7: Participation in cultural life

Responsibility: Australian Government

Response: Accept in principle

Update: In progress

Recommendation 9.7 recommends an additional amendment to the *National Disability Insurance Scheme Act 2013* (Cth) protecting the rights of First Nations participants to participate in cultural life, in addition to participate in social and economic life. The *NDIS Amendment (Getting the NDIS Back on Track No. 1) Bill 2025* includes Transitional Rules which specifically recognise participation in cultural activities as a NDIS funded support for First Nations participants¹⁷. The DRC Progress Report 2025 further described the ongoing work the NDIA is doing to support the rights of First Nations participants, including with the establishment of the Independent Advisory Council First Nations Reference Group, which will help to develop guidelines underpinning First Nations participant’s engagement in cultural life.

Recommendation 9.8: Return to Country

Responsibility: Australian Government

Response: Accept in principle

Update: Beginning stages

Recommendation 9.8 calls for cultural supports and Return to Country trips to be recognised by the NDIS, including with the creation of a new line item in the Pricing Agreement, and through the development of guidelines for NDIS staff on cultural supports. The NDIS draft discussion paper on the NDIS First Nations Market dated 17 October 2025 introduces the idea of developing a Return to Country policy. The DRC Progress Report 2025 refers to the development of a First Nation Strategy Implementation plan, which will supposedly include options for Return to Country¹⁸.

Recommendation 9.9: Criteria for funding family supports

Responsibility: Australian Government

Response: Accept in principle

Update: Beginning stages

Recommendation 9.9 proposes that First Nations family members of First Nations NDIS participants living in remote communities should be funded to provide supports, and policy guidelines supporting this arrangement should be developed by a co-designed process. According to the NDIS website, the Remote Service Delivery Framework aligns with the DRC, however this framework is not publicly available, so it is unclear whether it truly does align with recommendation 9.9¹⁹. Further, The DRC Progress Report 2025 claims this recommendation is in progress, referencing the NDIS First Nations Strategy 2025-2030 and stating the NDIS is commencing policy designed around funding family supports²⁰. It is worth noting that nowhere in the NDIS First Nations Strategy 2025 – 2030 is it mentioned family supports should be funded, nor has the NDIA confirmed explicitly they will be funding family supports.

Recommendation 9.10: First Nations Disability Forum

Responsibility: Australian, state and territory governments

Response: Accept in principle

Update: Beginning stages

Recommendation 9.10 proposes the establishment of a First Nations Disability Forum to lead the implementation of the Disability Sector Strengthening Plan, suggesting that the Forum should have been established by the end of 2024. Public consultations on the establishment of a First Nations Disability Forum were held from December 2024 to February 2025²¹. However, there are no publicly available updates on the outcomes of the consultation nor the establishment of the Forum.

Recommendation 9.11: Building on the Disability Sector Strengthening Plan

Responsibility: Australian, state and territory governments

Response: Accept in principle

Update: No update

Recommendation 9.11 recommends revising the Disability Sector Strengthening Plan in partnership with the First Nations Disability Forum. As mentioned above, the First Nations Disability Forum has yet to be established. According to the National Interim Progress report, the government agencies are working with the First Peoples Disability Network on implementing the Disability Sector Strengthening Plan²². However, there is no information on whether there is any intention to revise the Plan in line with the DRC's proposal.

Recommendation 9.12: Disability-inclusive cultural safety standards

Responsibility: Australian Government

Response: Accept in principle

Update: No update

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

Recommendation 9.13: Remote workforce development

Responsibility: Australian, state and territory governments

Response: Accept in principle

Update: No update

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

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- ¹³ Sawcan. Accessed November 2025. *Remote Community Connectors*. <https://www.sawcan.org.au/remote-community-connectors/>
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