

Analysis of Volume 11 of the Implementation of the DRC



Artwork by artist with lived experience of disability, Cynthia Gregg

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 Cynthia Gregg. Through her artwork, Cynthia aims to capture the discomfort she felt in some of the healthcare waiting rooms and hopes that the imagery and text included would be thought provoking.

Cynthia says:

"The painting is about the lack of inclusion and support for those with mental health concerns, within the healthcare system. I have found that in seeking help from mental health services - there are extraordinarily long wait times, often in uncomfortable rooms that are sometimes unsafe; which is not appropriate. Too many people with disabilities are slipping through the cracks, because of the lack of appropriate services, and that's unfair."

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 11: Independent oversight and complaint mechanisms

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

Recommendation 11.1: Nationally consistent adult safeguarding functions

Responsibility: Australian, state and territory governments

Response: Subject to further consideration

Update: No update

Recommendation 11.1 recommends different measures to achieve nationally consistent adult safeguarding functions, including introducing legislation establishing consistent safeguarding functions, ensuring the functions are operated by independent statutory bodies, and are also operated under a proposed National Adult Safeguarding Framework. Though the Australian Government announced an investment of \$15.6 million into a Quality and Safeguarding Framework and Disability Support Ecosystem Safeguarding Strategy¹⁰, there is currently no updates publicly available on these strategies, nor whether they meet the intent of this recommendation.

Recommendation 11.2: An integrated national adult safeguarding framework

Responsibility: Australian, State and territory government

Response: Subject to further consideration

Update: No update

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

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

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

Responsibility: State and territory governments

Response: Accept in principle

Update: No update

Recommendation 11.3 proposed that each state and territory establish independent 'one-stop shop' complaint reporting, referral and support mechanisms for people with disability to report experiences of violence, abuse, neglect and exploitation. The Queensland Government continues to consider this recommendation in collaboration with the Australian Government and other states and territories despite other states varied progress¹¹.

Recommendation 11.4: Creating accessible complaint pathways

Responsibility: Australian, state and territory governments

Response: Accept in principle

Update: No updates

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

Recommendation 11.5: Complaint handling and investigative practice guidelines

Responsibility: Australian, state and territory governments

Response: Accept in principle

Update: No updates

Recommendation 11.5 calls for the co-designed development of a complaints handling system for people with disability which is to be implemented by the NDIS Quality and Safeguards Commission, state ombudsman, and other bodies who are involved in complaints management. Whilst the Commonwealth Ombudsman is considering how to advance this work¹² there are no clear meaningful updates on next steps or timeframes.

Recommendation 11.6: Enshrining key provisions of OPCAT in legislation

Responsibility: Australian Government

Response: Accept in principle

Update: No updates

Recommendation 11.6 asks the Australian Government to introduce national legislation enshrining the Optional Protocol to the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (**OPCAT**), and coordinate Australia's response to the OPCAT. Whilst the Australian Government states it continues to work with states and territories on OPCAT implementation¹³ there is no transparency on what this entails. Given the history of delays, extensions and alleged non-compliance¹⁴ since ratification of the OPCAT in 2017, QIDAN are concerned with the lack of ongoing progress. Queensland are one of three states (New South Wales, Queensland and Victoria) yet to nominate a National Preventative Mechanism further delaying implementation in Queensland.

Recommendation 11.7: Resourcing and wider definition of places of detention

Responsibility: Australian, state and territory governments

Response: Accept in principle/subject to further consideration

Update: No updates

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

Recommendations 11.8 – 11.9: Legislate and Designate National Preventive Mechanisms

Responsibility: State and territory governments

Response: Subject to further consideration

Update: No updates

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

Recommendation 11.10: Improved consistency and coordination

Responsibility: Australian Government

Response: Accept in Principle

Update: No updates

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

Recommendation 11.11: Disability inclusive approach to implementing OPCAT

Responsibility: Australian, state and territory governments

Response: Accept in principle/subject to further consideration

Update: No updates

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

Recommendation 11.12: Nationally consistent community visitor schemes

Responsibility: Australian, state and territory governments

Response: Accept in principle

Update: Beginning stages

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

Recommendation 11.13: Integration of community visitor schemes with the NDIS

Responsibility: Australian, state and territory governments

Response: Accepted in principle

Update: No updates

Recommendation 11.13 recommends the *National Disability Insurance Scheme Act 2013* (Cth) be amended to formally recognise community visitor schemes (**CVS**) as a safeguard, and to provide a legislative framework authorising information sharing between the NDIS Quality and Safeguards Commission and CVS. Though it appears this subject was raised in the consultation about CVS facilitated by the Department of Health, Disability, and Ageing¹⁵, there are no meaningful updates on this recommendation.

Recommendations 11.14 – 11.16: Establishment of disability death review schemes

Responsibility: State and territory governments

Response: Subject to further consideration

Update: No updates

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

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

Recommendation 11.17: Nationally consistent reportable conduct scheme

Responsibility: State and territory governments

Response: Accept in principle

Update: In progress

Recommendation 11.17 sets out how states and territories can harmonise and strengthen reportable conduct schemes, including recommendations to introduce or amend existing legislation to ensure disability service providers who support children with disability are included in reportable conduct scheme, and adding 'ill-treatment' into definitions of reportable conduct. In June 2024, the Queensland Government introduced the *Child Safe Organisation Bill 2024* to establish a framework for nationally consistent reportable conduct scheme within Queensland, also adding the term 'ill-treatment' into state-used definitions. In the DRC Progress Report 2025 the Queensland Government considered part (c) partly complete with an update to the reportable conduct scheme to commence from 1 July 2026¹⁶.

Recommendation 11.18: Dual oversight of reportable conduct and incidents

Responsibility: Australian, state and territory governments

Response: Accept in principle

Update: No update

Recommendation 11.18 recommends that reportable scheme operators and the NDIS Quality and Safeguards Commission should develop guiding principles and guidance material on the effective handling of reportable incidents. The DRC Progress Report 2025 stated the NDIS Practice Standards review will consider these recommendations¹⁷. However, in Queensland, The Queensland Family and Child Commission is responsible for the administration of reportable conduct scheme. There is no information available on whether the Queensland Family and Child Commission has worked with the NDIS Quality and Safeguards Commission to develop shared guiding principles.

References

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- 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-communication-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>
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- ⁷ Queensland Government. (2024). *Queensland Government response to the Disability Royal Commission* (pp, 100). <https://www.health.gov.au/sites/default/files/2025-11/original-queensland-government-response-to-the-disability-royal-commission.pdf>
- ⁸ Queensland Government. (2025). *Queensland Government Response to the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability* (pp, 92). https://www.families.qld.gov.au/_media/documents/disability/disability-royal-commission/qld-govt-response-disability-royal-commission.pdf
- ⁹ Ibid (pp, 98)
- ¹⁰ Australian Government Department of Health, Disability and Ageing. (Accessed November 2025). *Responding to the disability royal commission*. <https://www.health.gov.au/resources/publications/responding-to-the-disability-royal-commission.html?language=en>
- ¹¹ Australian Government Department of Health, Disability and Ageing. (November 2025). *Disability Royal Commission progress report 2025 - recommendation 11.3*. <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>
- ¹² Australian Government Department of Health, Disability and Ageing. (November 2025). *Disability Royal Commission progress report 2025 - recommendation 11.5*. <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>
- ¹³ Australian Government Department of Health, Disability and Ageing. (November 2025). *Disability Royal Commission progress report 2025 - recommendation 11.6*. <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>
- ¹⁴ Australian Human Rights Commission. *Optional Protocol to the Convention against Torture*. <https://humanrights.gov.au/resource-hub/by-resource-type/publications/asylum-seekers-and-refugees-resources/guides/opcat-optional-protocol-convention-against-torture>
- ¹⁵ Australian Government Department of Health, Disability and Ageing. (2025). *Community visitor schemes – public consultations*. <https://consultations.health.gov.au/community-visitor-schemes-cvs/community-visitor-schemes-public-consultation/>
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¹⁷ Australian Government Department of Health, Disability and Ageing. (November 2025). *Disability Royal Commission progress report 2025 - recommendation 12.8*.

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