

Submission to the Senate Community Affairs Legislation Committee

National Disability Insurance Scheme Amendment (Integrity and Safeguarding) Bill 2025

Submitted by: [REDACTED]

Role: [REDACTED]

Location: [REDACTED]

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Executive Summary

This submission is informed by frontline professional experience supporting NDIS participants with complex, psychosocial, and progressive disabilities. While the intent of strengthening integrity and safeguarding within the NDIS is supported, this submission raises concerns that aspects of the Bill may increase participant risk if integrity measures are not accompanied by safeguards that ensure timely, evidence-based decision-making and the preservation of effective navigation supports.

1. Integrity Measures Must Be Balanced With Participant Safety

Integrity measures that restrict flexibility or increase compliance requirements risk exacerbating harm when decision-making quality is poor. In practice, evidence is frequently inadequately reviewed, supports are removed at times of greatest need, and participants are left unsafe while reviews are delayed. Without safeguards ensuring accurate and timely decisions, expanded integrity powers may compound existing failures rather than prevent misuse.

2. Safeguarding Requires Timely Access to Supports

Safeguarding is undermined when participants experience repeated plan rollovers without reassessment, Change of Circumstances requests closed without communication, or prolonged delays in review decisions. Strengthening enforcement powers without addressing these systemic failures risks creating procedural compliance without real-world safety.

3. Impact on Psychosocial and Progressive Disability Cohorts

Participants with psychosocial or progressive neurological disabilities are particularly vulnerable under rigid integrity frameworks. Fluctuating capacity, trauma, paranoia, and executive dysfunction require flexible, relationship-based supports. Safeguards must accommodate complexity rather than penalise disengagement or instability.

4. Support Coordination as a Core Safeguard

Support Coordination functions as a primary safeguarding mechanism by identifying risk, supporting engagement, ensuring appropriate use of funding, and preventing crisis escalation. Any reform that weakens or removes Support Coordination undermines the safeguarding objectives of the Bill and increases participant vulnerability.

5. Case Example – Integrity Without Safeguards Increases Risk (De-identified)

A participant with a progressive neurological disability experienced removal of allied health supports during functional decline and frequent falls. Review processes were delayed, and integrity-focused decision-making proceeded without adequate consideration of risk or clinical evidence. This case demonstrates how integrity measures applied without safeguards can increase harm rather than protect participants.

6. Recommendations in Relation to the Bill

Recommendations include embedding mandatory risk and evidence review safeguards alongside integrity powers, protecting Support Coordination as a safeguarding function, ensuring integrity measures do not delay urgent supports, requiring transparent written reasons for decisions, and including explicit protections for psychosocial and progressive disability cohorts.

Conclusion

Integrity and safeguarding cannot be achieved through restriction alone. Without strong decision-making safeguards, clinical accountability, and trusted navigation supports, the Bill

risks worsening outcomes for those it intends to protect.