



9 February 2026

Senator Dorinda Cox
Chair, Senate Standing Committee on Community Affairs
PO Box 6100
Parliament House
Canberra ACT 2600

Dear Senator Dorinda Cox,

Subject: Letter of support for Inclusion Australia re: National Disability Insurance Scheme Amendment (Integrity and Safeguarding) Bill 2025

Thank you for the opportunity to provide a submission to the Community Affairs Legislation Committee on the National Disability Insurance Scheme Amendment (Integrity and Safeguarding) Bill 2025 (the Bill) currently before Parliament. We are pleased to provide this letter of support for Inclusion Australia's submission.

We are collaborating with Inclusion Australia on a research project entitled *Safe Homes* (funded by the National Disability Research Partnership) which investigates safety of service-for-one arrangements for people with intellectual disability and complex support needs. In interviews with people with intellectual disability and their family members, early findings show that this model supports safety, independence, and choice and control. Families have also raised concerns that these models are not being fully supported by the NDIA. Given the positive impacts of service-for-one arrangements on safety and quality of life, there is a strong case for ensuring that these models are supported to be sustainable over time.

The project team wishes to express its support for Inclusion Australia's submission, particularly its analysis of the potential unintended consequences of the proposed Schedule 1 amendments and the importance of ensuring that civil penalties are proportionate and do not undermine the viability of services-for-one.

We share Inclusion Australia's concern that changes to the penalty framework and statutory requirements may disproportionately impact bespoke support models, including services-for-one. These models are often operated by families through small, dedicated legal entities that exist solely to support one person with disability, frequently someone with complex or high support needs who has not been able to access safe or appropriate supports through mainstream or group-based services.

Services-for-one arrangements are typically supported by administrative arrangements that are proportionate to their scale of service-delivery and are often complemented by unpaid, informal supports. In this context, there is a risk that inadvertent or minor administrative non-compliance could attract significant penalties or enforcement action under a strengthened regime. The resulting regulatory and financial burden may force families to abandon arrangements that are otherwise delivering safe, stable, highly individualised and trauma-informed support, with no realistic alternative available.

We support Inclusion Australia's call for legislative and regulatory reform that strengthens safeguards while remaining proportionate, risk-based and responsive to context, so that services-for-one can continue to operate safely and sustainably for the people who rely on them.



Sincerely,

Yours sincerely



Dr Tess Bright, University of Melbourne
Senior Research Fellow
Lead of University of Melbourne *Safe Homes* project team
Disability and Health Unit
Melbourne School of Population and Global Health