

Joint Standing Committee on the National Disability Insurance Scheme
PO Box 6100
Parliament House
Canberra ACT 2600

24 April 2026

Attention: Joint Standing Committee on the National Disability Insurance Scheme

Please accept this letter as Children and Young People with Disability Australia (CYDA)'s submission to the Inquiry into the Integrity of the National Disability Insurance Scheme.

Thank you for the opportunity to provide feedback on this important topic.

Children and Young People with Disability Australia (CYDA)

CYDA is the national representative organisation for children and young people with disability aged 0 to 25 years. CYDA has extensive national networks of young people with disability, their families and caregivers, and advocacy and community organisations.

Our vision is that children and young people with disability in Australia will fully exercise their rights, realise their aspirations, and thrive in all communities.

CYDA's Response to the Inquiry

Our response is informed by the lived and living experience and expertise of our membership of children and young people with disability and their families and caregivers, as well as CYDA staff with lived and family experience of disability.

It is also informed by relevant research literature and CYDA's previous consultations with our community, related to this inquiry:

- Thriving Kids Survey Report (2025, 1235 responses from young people with disability, their families and caregivers)¹
- NDIS Eligibility Re-assessments Survey Report (2025, 222 responses from young people with disability, their families and caregivers)²
- NDIS Provider Registration Survey Report, (2024, 161 responses from young people with disability, their families and caregivers).³

Introduction and Context

Children and young people represent a significant and growing proportion of people with disability in Australia and make up a large share of National Disability Insurance Scheme (NDIS) participants. In 2022, an estimated 946,300 children and young people aged 0–24 years (12.1 per cent) had disability, with around six per cent experiencing profound or severe disability. Most required assistance with everyday activities, and more than half experienced multiple types of disability, reflecting the complexity of supports required for this group⁴.

The NDIS plays a particularly important role in the lives of children and young people. Compared with the broader disability population, participants in the scheme are much younger, with 43 per cent aged 14 years or under⁵. Eligibility rates are highest for younger applicants, reflecting the importance of early identification and support. Children and young people rely on a wide range of providers, including therapy providers, support workers and community-based services, and require flexible supports that respond to changing developmental and family needs.

Despite the central role of the NDIS in providing quality and safe supports, many children, families, and caregivers experience gaps in support, leading to integrity risks in the scheme. More than four in five children with disability have unmet support needs, particularly for therapies, school-based supports, and support workers^{6 7}. These gaps are greater for children from low-income households, single-parent families, First Nations backgrounds, culturally diverse communities, and regional or remote areas. Barriers to access also disproportionately affect girls and children with intellectual disability.

Submission Structure

In our submission we address the following three items from the Committee's Terms of Reference. For each topic area, we provide one recommendation.

1. The impacts of non-compliance on NDIS participants and their families;
2. The effectiveness and adequacy of successive government policies to improve scheme integrity, safeguard participants, and tackle non-compliance; and
3. Any legislative or other reforms required to strengthen scheme integrity.

Note: We have deliberately focused on provider non-compliance to avoid attributing systemic failures to participants or reinforcing narratives that position children and young people with disability as offenders rather than rights-holders. CYDA recommends that integrity reforms be accompanied by accessible, co-designed public messaging that emphasises participant safeguarding and avoids blaming people with disability.

Summary of Recommendations

1. Strengthen 'continuity of supports safeguards' by requiring the NDIS Quality and Safeguards Commission and the NDIA to proactively plan for provider exits, including guaranteed timely access to alternative supports, clear and accessible communication with children, young people and their families, and funded transitional arrangements that prevent gaps in essential services.

2. Implement a flexible approach to NDIS provider registration within a graduated, risk-proportionate registration model that protects safety and quality while preserving choice and control.
3. Strengthen scheme integrity through independent oversight, system alignment, and genuine co-design with participants.
 - 3.1 Establish independent oversight and accountability
 - 3.2 Align supports across systems to prevent gaps
 - 3.3 Embed co-design and transparent communication

1. The impacts of non-compliance of providers on NDIS participants and their families

Recommendation 1: *Strengthen ‘continuity of supports safeguards’ by requiring the NDIS Quality and Safeguards Commission and the NDIA to proactively plan for provider exits, including guaranteed timely access to alternative supports, clear and accessible communication with children, young people and their families, and funded transitional arrangements that prevent gaps in essential services.*

CYDA supports the federal government’s recent legislative reforms and investment to address fraud and non-compliance as a critical mechanism for strengthening safeguards within the NDIS^{8 9}. We also welcome the expanded powers of the NDIS Quality and Safeguards Commission, introduced through the National Disability Insurance Scheme Amendment (Integrity and Safeguarding) Bill 2026, to better protect participants from harm.

However, these reforms have direct and immediate impacts on the availability and continuity of supports. Children and young people with disability rely on multiple, interconnected services across health, education, and community settings. Provider integrity is therefore essential not only for safety and quality, but also for maintaining consistent, flexible, and responsive supports—both inside and outside the NDIS.

While the identification and removal of non-compliant or fraudulent providers is necessary, it can create unintended disruption to essential services—particularly where alternative providers are limited or unavailable. For children, young people and their families, this can mean gaps in critical supports, increased stress, and reduced capacity to exercise genuine choice and control.

It is therefore essential that strengthened enforcement powers to address abuse, neglect, exploitation, and fraud are implemented in a way that does not inadvertently undermine participant outcomes. Safeguards must operate alongside measures that actively preserve continuity of care, uphold choice and control, and prevent harm caused by sudden service disruption.

2. The effectiveness and adequacy of successive government policies to improve scheme integrity, safeguard participants, and tackle non-compliance

Recommendation 2: *Implement a flexible approach to NDIS provider registration within a graduated, risk-proportionate registration model that protects safety and quality while preserving choice and control.*

CYDA gives in-principle support to recent government reforms to strengthen NDIS integrity, including proposals arising from the NDIS Review and subsequent announcements to expand provider registration^{10 11}. As recommended in our previous work¹², a graduated, risk-proportionate registration model is a necessary step to improve oversight, reduce fraud, and strengthen participant safeguards.

However, the effectiveness of these reforms will depend on how well they balance regulation with the realities of participants' lives. Children and young people with disability often rely on a mix of formal, informal, and mainstream supports across multiple systems. For many—particularly those with complex needs—support arrangements can include “service-for-one” models, where families directly employ unregistered workers and manage administrative responsibilities due to a lack of suitable providers.

A rigid or overly broad registration model risks undermining these arrangements. If low-risk or incidental supports are captured unnecessarily, this may reduce access to trusted providers, disrupt established relationships, and limit timely, flexible supports. Evidence from CYDA's 2024 Registered Provider Survey¹³ reinforces that families value continuity of workers, personalised supports, and the ability to access community-based and inclusive services.

Maintaining flexibility is especially critical for children and young people in regional and remote areas, and those from First Nations, culturally and linguistically diverse, and LGBTIQ+ communities, who may rely on a small number of trusted or culturally safe providers. In these contexts, excessive regulatory burden may reduce, rather than enhance, safety by shrinking the available provider pool.

Registration alone does not guarantee safety or quality. CYDA has consistently heard from children and young people with disability and their families that there can be a gap between provider governance requirements and the quality of supports delivered in practice. A risk-proportionate approach must therefore clearly distinguish between high-risk supports requiring strong regulatory oversight, and lower-risk supports where registration would not meaningfully improve safety or quality. This will ensure integrity measures do not inadvertently create new barriers to access or undermine participant choice and control.

3. Any legislative or other reforms required to strengthen scheme integrity

Recommendation 3: *Strengthen scheme integrity through independent oversight, system alignment, and genuine co-design with participants.*

3.1 Establish independent oversight and accountability

Create an independent oversight mechanism to monitor the implementation of NDIS reforms across sectors, ensuring consistent quality, equitable access, and clear accountability.

3.2 Align supports across systems to prevent gaps

Fund and mandate coordination between the NDIS and mainstream systems, including enabling parallel access to supports for young children with high needs and investing in evidence-based early intervention, such as funding the implementation of the National Best Practice Framework for Early Childhood Intervention¹⁴.

3.3 Embed co-design and transparent communication

CYDA requires all major reforms to be co-designed with children, young people and families, supported by clear, accessible communication to build trust and ensure reforms are understood and effective.

CYDA considers that strengthening scheme integrity requires not only robust compliance and enforcement, but also transparent oversight, system alignment, and meaningful participant involvement. Without these, reforms risk creating inconsistency, confusion, and gaps in supports—undermining both trust and the effective operation of the NDIS.

Children and young people with disability often navigate supports across multiple systems, including the NDIS, health, education, and community services. Feedback from CYDA's community highlights that this fragmented landscape can lead to variable quality, inequitable access, and uncertainty about roles and responsibilities¹⁵. These inconsistencies weaken scheme integrity by creating gaps in accountability, and increase the risk that children and young people fall through the cracks.

Recent and proposed reforms—including changes to provider registration, assessments, and the interface with initiatives such as Foundational Supports and Thriving Kids—have also generated significant confusion for families¹⁶. Where reforms are not clearly communicated, aligned across systems, or shaped by participant experience, they can erode trust and reduce the effectiveness of integrity measures.

Strengthening integrity therefore requires a coordinated approach that ensures reforms are implemented consistently, transparently, and with accountability across all systems that interact with the NDIS. It also requires embedding the voices of children, young people, and families in the design and implementation of reforms to ensure they are workable, equitable, and uphold the intent of the ecosystem.

Thank you again for this opportunity to make a submission.

If you have any questions about this letter or you would like to know more about CYDA's policy and research work please do not hesitate to contact Dr Liz Hudson, Policy and Research Manager at lizhudson@cyda.org.au.

Kind regards,



Skye Kakoschke-Moore

Chief Executive Officer

Endnotes

¹ CYDA (2025) *Masking is not thriving: Views of children and young people with disability, parents and caregivers on Thriving Kids*. Visit <https://cyda.org.au/cydas-thriving-kids-survey-report-masking-is-not-thriving/>.

² CYDA (2025) *NDIS eligibility reassessments: Survey of children and young people with disability, parents and caregivers*. Visit <https://cyda.org.au/ndis-eligibility-reassessments-cydas-survey-of-children-and-young-people-with-disability-parents-and-caregivers/>.

³ CYDA (2024) *Submission to the NDIS Provider and Worker Registration Taskforce*. Visit <https://cyda.org.au/cydas-submission-to-the-ndis-provider-and-worker-registration-taskforce/>.

⁴ Australian Bureau of Statistics (ABS) (2022) *Children and young people with disability*. Visit: <https://www.abs.gov.au/articles/children-and-young-people-disability-2022>.

⁵ Australian Institute of Health and Welfare (AIHW) (2024) *People with disability in Australia: Specialist disability support services*. Visit <https://www.aihw.gov.au/reports/disability/people-with-disability-in-australia>.

⁶ National Disability Insurance Agency (NDIA) (2025) *Explore data. Period: Q4 FY24-25*. Visit <https://dataresearch.ndis.gov.au/explore-data>.

⁷ O'Flaherty, M. et al. (2024) *Australian children with disabilities' unmet support needs: Evidence from the Better Support for Kids with Disabilities survey*. Life Course Centre Working Paper Series. Visit: <https://lifecoursecentre.org.au/working-papers/australian-children-with-disabilities-unmet-support-needs-evidence-from-the-better-support-for-kids-with-disabilities-survey/>.

⁸ NDIS Amendment (Integrity and Safeguarding) Bill 2026. Visit https://www.aph.gov.au/Parliamentary_Business/Bills_Legislation/Bills_Search_Results/Result?bld=s1478.

⁹ The Hon Mark Butler MP Minister for Health and Ageing (April 2026) *Securing the future of the NDIS for future generations*. Visit <https://www.health.gov.au/ministers/the-hon-mark-butler-mp/media/securing-the-future-of-the-ndis-for-future-generations?language=en>.

¹⁰ Independent NDIS Review (2023) *Final Report, Recommendation 17*. Visit <https://www.ndisreview.gov.au/resources/reports/working-together-deliver-ndis/>.

¹¹ The Hon Mark Butler MP Minister for Health and Ageing (April 2026) *Securing the future of the NDIS for future generations*. Visit <https://www.health.gov.au/ministers/the-hon-mark-butler-mp/media/securing-the-future-of-the-ndis-for-future-generations?language=en>.

¹² CYDA (2026) *Submission to Getting It Right: A New Definition for NDIS Providers consultation*. Visit <https://cyda.org.au/cydas-submission-to-the-getting-it-right-a-new-definition-for-ndis-providers-consultation/>.

¹³ CYDA (2024) *Submission to the NDIS Provider and Worker Registration Taskforce*. Visit <https://cyda.org.au/cydas-submission-to-the-ndis-provider-and-worker-registration-taskforce/>.

¹⁴Department of Health, Disability and Ageing (2025) National Best Practice Framework for Early Childhood Intervention. Visit <https://www.health.gov.au/our-work/national-best-practice-framework-for-early-childhood-intervention>.

¹⁵ See CYDA (2025) *Masking is not thriving: Views of children and young people with disability, parents and caregivers on Thriving Kids*. Visit <https://cyda.org.au/cydas-thriving-kids-survey-report-masking-is-not-thriving/>; CYDA (2025) *NDIS eligibility reassessments: Survey of children and young people with disability, parents and caregivers*. Visit <https://cyda.org.au/ndis-eligibility-reassessments-cydas-survey-of-children-and-young-people-with-disability-parents-and-caregivers/>; and CYDA (2024) *Survey of Young people, parents, and caregivers on Foundational Supports*

¹⁶ The Hon Mark Butler MP Minister for Health and Ageing (April 2026) *Securing the future of the NDIS for future generations*. Visit <https://www.health.gov.au/ministers/the-hon-mark-butler-mp/media/securing-the-future-of-the-ndis-for-future-generations?language=en>, The Hon Mark Butler MP Minister for Health and Ageing (August 2025), *Securing the future of the NDIS (Thriving Kids Announcement)*. Visit <https://www.health.gov.au/ministers/the-hon-mark-butler-mp/media/speech-from-minister-butler-national-press-club-20-august-2025?language=en>