

Australian Autism Alliance

Submission to the Senate Community Affairs Legislation Committee Inquiry into the NDIS Amendment (Integrity and Safeguarding) Bill 2025

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We acknowledge the First Nations and Traditional Owners of the land, sea and waterways and pay respects to Elders past, and present and recognise those whose ongoing effort to protect and promote Aboriginal and Torres Strait Islander cultures will leave a lasting legacy for future Elders and leaders.

We recognise the enduring connection that First Nations peoples have to land, waters, culture, and community. This land was, is, and always will be Aboriginal land.

We acknowledge the individual and collective expertise of those with a living or lived experience of disability, as well as the lived experience of people who have been carers. We recognise their vital contribution at all levels and value the courage of those who share their unique perspective for the purpose of learning and growing together to achieve better outcomes for all.

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1.0 About the Australian Autism Alliance

www.australianautismalliance.org.au

The [Australian Autism Alliance](#) (the Alliance) welcomes the Committee's Inquiry and thanks you for your time and dedication to securing thriving futures for all citizens.

The Alliance was established in 2016 and aims to improve the life chances of Autistic people and facilitate collaboration within the autism community. The members represent a cohesive national network of key organisations with a diverse focus on autism – that is led by Autistic people, advocacy groups, peak bodies, service providers, and researchers.

We reach over half a million people through our communication channels and provide support to people with autism across the lifespan. Most importantly, our work is informed by Autistic people and the Australian Autism community.

The Alliance is a funded Disability Representative Organisation (DRO) advocating for a Strong Voice for Autism, and supports Australian government (at all levels) in various roles and representations, including: DSS Disability, Representative Organisation, the NDIA Autism Advisory Group, the NDIA DRCO Co-Design Advisory and Reform groups, NDIS Commission Disability Sector Consultative group, National Autism Strategy Oversight Council member, and National Health and Mental Health Roadmap for Autistic people.



We:

- are Australia's first diverse collaborative network of autism organisations bringing together a range of autism interests.
- are a funded Disability Representative Organisation (DRO) since 2024 advocating reach well over half a million people through our communication channels and provide support to Autistic people across the lifespan from early childhood to adulthood. Most importantly, our work is informed by Autistic people and the Australian Autism community
- have significant national and international linkages for advocacy, research and service delivery.
- worked with government to secure pre-election commitments for the National Autism Strategy and National Health and Mental Health Roadmap
- continue to support government through being active in various roles and representations, including: DHDA DRO forums, the NDIA Autism Advisory Group, the NDIA DRCO Co-Design Advisory and Reform groups, NDIS Commission Disability Sector Consultative group, National Autism Strategy Oversight Council member, National Health and Mental Health Roadmap for Autistic people, and Children's Expert Advisory Group
- have been a witness at a number of inquiries including the Senate Inquiry into Autism and the NDIS Capability and Culture of the NDIA.
- commissioned the largest and most comprehensive community consultation survey of Autistic people and their families and carers in Australia to inform the Senate Inquiry into Autism with over 3,800 responses received.

1 Executive Summary

The Australian Autism Alliance (the Alliance) welcomes the opportunity to provide this submission on the National Disability Insurance Scheme Amendment (Integrity and Safeguarding) Bill 2025 (the Bill).

The Alliance supports the Bill's intent to strengthen participant safeguards, enhance regulatory integrity, and deter unsafe and exploitative conduct within the NDIS. The Explanatory Memorandum confirms that the Bill responds to the 2023 NDIS Review and the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability.

The Alliance notes that the NDIS Review identified fragmentation in safeguarding arrangements and concerns that the NDIS Quality and Safeguards Commission lacked sufficient enforcement capacity. The Royal Commission similarly emphasised the need for a more active regulatory model focused on monitoring and enforcement.

The Alliance supports strengthened enforcement where it protects participants from abuse, exploitation and systemic harm.

Autistic and neurodivergent participants experience elevated safeguarding risks, including abuse, exploitation, behavioural compliance harms, service withdrawal, and administrative exclusion. These risks intersect with communication differences, sensory needs, executive functioning challenges and systemic power imbalances, requiring tailored policy responses. Strengthened oversight is necessary and appropriate.

Stronger enforcement, however, must be accompanied by clear legislative guardrails, procedural safeguards, accessibility protections and enforceable human rights duties to ensure integrity reforms strengthen — rather than inadvertently diminish — participant autonomy, accessibility, supported decision-making, human rights, service continuity, or market sustainability.

This submission outlines targeted legislative refinements and implementation safeguards to ensure in a trauma-informed, neurodiversity-affirming, proportionate and rights-aligned manner.

The Alliance has consistently advocated in past submissions to:

- Autism-specific safeguarding frameworks
- Trauma-informed service and regulatory design
- Administrative justice safeguards
- CRPD-aligned legislative interpretation
- Cross-government safeguarding governance
- Safeguarding of participants requiring substantial support

Similarly, the Alliance recommends targeted legislative refinements and implementation safeguards to ensure strengthened regulatory powers in the Bill operate in a trauma-informed, neurodiversity-affirming and rights-aligned manner.

Key recommendations include:

- Embedding supported decision-making and dignity-of-risk principles in legislation
- Introducing external merits review rights for key regulatory decisions
- Establishing statutory accessibility duties for administrative and digital systems
- Implementing proportional compliance safeguards and workforce capability initiatives
- Strengthening information-gathering safeguards
- Legislating co-design duties and human-rights-based interpretation frameworks

2. Guiding Principles

2.1 Context and Purpose

2.1.1 The Bill significantly expands enforcement, monitoring and compliance powers under the NDIS Act. These reforms respond to findings of the NDIS Review and the Disability Royal Commission that safeguarding arrangements have been fragmented and that regulatory responses have not always been sufficiently robust.

2.1.2 The Alliance supports strengthened enforcement where it protects participants from abuse, exploitation and systemic harm.

2.1.3 However, expanded executive and regulatory powers must operate within clear human rights boundaries to ensure that strengthened integrity mechanisms do not inadvertently undermine participant autonomy, accessibility, or access to supports.

2.1.4 The following guiding principles are provided to assist the Committee in assessing the Bill and to support rights-aligned interpretation and implementation of the amended Act.

2.2 Human Rights and Supported Decision-Making

2.2.1 The Bill should be interpreted and implemented consistently with Australia's obligations under the Convention on the Rights of Persons with Disabilities (CRPD), including:

- Article 12 — Equal recognition before the law and supported decision-making
- Article 16 — Freedom from exploitation, violence and abuse
- Article 19 — Living independently and being included in the community
- Article 21 — Freedom of expression and communication
- Article 22 — Respect for privacy

2.2.2 Safeguarding must protect participants from harm without diminishing autonomy or reverting to substitute decision-making.

2.3 Dignity of Risk and Risk Enablement

2.3.1 The Disability Royal Commission and the NDIS Review emphasised the importance of dignity of risk.

2.3.2 Safeguarding frameworks must preserve participant autonomy and enable reasonable risk-taking in pursuit of community participation.

2.3.3 Enforcement mechanisms should not incentivise exclusion of participants with complex support needs or discourage innovative, community-based supports.

2.4 Neurodiversity-Affirming Safeguarding

2.4.1 Autistic and neurodivergent participants experience elevated safeguarding risks, including overuse of compliance-based behavioural models.

2.4.2 Regulatory interpretation must not reinforce behavioural compliance approaches that suppress autistic identity, communication styles, or sensory regulation.

2.4.3 Safeguarding should promote wellbeing, autonomy and inclusion, consistent with contemporary neurodiversity-affirming practice.

2.5 Accessibility and Administrative Justice

2.5.1 Expanded regulatory powers must be balanced with accessible procedural safeguards to prevent administrative exclusion.

2.5.2 This includes:

- Procedural fairness
- Accessible processes and communication
- Supported decision-making
- Proportionate compliance
- External merits review rights
- Statutory accessibility duties

2.6 Market Sustainability

2.6.1 Autistic participants rely heavily on specialist, culturally safe and lived-experience providers.

2.6.2 Compliance frameworks must be proportionate and must not unintentionally reduce service availability in thin or complex markets.

3. Schedule 1 — Amendments Relating to the NDIS Quality and Safeguards Commission

3.1 Civil and Criminal Penalty Framework

3.1.1 The Alliance supports strengthened civil and criminal penalties to deter serious misconduct and address unsafe provider practices.

3.1.2 However, strengthened penalties must be accompanied by clear statutory guidance to ensure that:

- Definitions of “serious contravention” are precise and consistently applied
- Enforcement does not incentivise provider withdrawal from participants with complex needs
- Regulatory interpretation clearly distinguishes participant distress from provider misconduct

Recommendations:

3.1.3 A statutory proportionality duty should require regulators to consider thin-market impacts, participant access, and service continuity when exercising enforcement powers.

3.1.4 Implementation should include a Small Provider Support Program offering compliance templates, technical assistance and transitional guidance to reduce unintended market exit, particularly among specialist and neurodivergent-led services.

Regulatory guidance should clarify that communication differences — including the use of Augmentative and Alternative Communication (AAC), delayed processing, literal interpretation, or alternative expression styles — must not be mischaracterised as “false or misleading information” where there is no intent to deceive. Enforcement frameworks must recognise disability-related communication differences to avoid administrative injustice.

3.2 Provider Registration and Compliance

3.2.1 Stronger offences for unregistered providers aim to improve safety and scheme integrity.

3.2.2 Autistic participants frequently rely on:

- Peer workers
- Neurodivergent-led services
- Small specialist providers

Recommendations:

3.2.3 Proportionate regulatory pathways and transitional supports are necessary to ensure that strengthened compliance requirements do not unintentionally exclude these supports or reduce participant choice.

3.3 Banning Orders

3.3.1 The Alliance supports expanded banning powers to address unsafe or exploitative conduct.

Recommendations:

3.3.2 Given the significant consequences of banning orders, safeguards should include:

- Published and objective criteria
- Clearly defined evidentiary thresholds
- Natural justice protections
- Time-limited interim orders
- Plain-language written reasons
- Administrative Review Tribunal (ART) review rights

In addition, the Alliance recommends that legislation explicitly require notice of proposed action and a genuine opportunity to respond prior to final determination, except in clearly defined urgent circumstances. Where interim banning orders are made on an urgent basis, affected persons should be afforded a prompt opportunity to make representations before continuation or confirmation of the order. Clear procedural safeguards are necessary to ensure that expanded banning powers do not unintentionally exclude lived-experience consultants, neurodivergent workers, culturally safe providers, or small specialist services without appropriate review and fairness protections.

3.3.3 In addition to access to ART review, legislation should ensure availability of appropriate stay powers pending determination of review proceedings where continuation of the decision would cause disproportionate or irreparable harm. This is particularly important where banning orders or interim measures may immediately affect workforce participation, participant continuity of supports, or service viability.

3.4 Anti-Promotion Orders

3.4.1 The Alliance supports anti-promotion powers addressing misleading therapeutic claims, including cure narratives and identity-suppressing compliance models.

Recommendations:

3.4.2 To ensure proportional and transparent application, safeguards should include:

- Clear criteria defining harmful neurodiversity-denying practices
- Published regulatory guidance
- Plain-language reasoning
- ART review rights

3.4.3 Clarify that promotional conduct undermining neurodiversity-affirming practice constitutes a regulatory ground for anti-promotion orders.

3.5 Monitoring, Investigation and Information-Gathering Powers

3.5.1 Expanded monitoring and investigation powers may enable more timely regulatory intervention.

Recommendations:

3.5.2 However, given the breadth of these powers, safeguards must include:

- Clearly articulated statutory thresholds
- Disability-informed response timeframes
- Plain-language notices and communication accessibility
- Access to independent advocacy
- ART review rights for substantive determinations

The Alliance further recommends that investigative and monitoring processes incorporate trauma-informed and sensory-safe practices, including reasonable adjustments to minimise sensory overload, flexible interview formats, and access to communication supports. Many Autistic participants and small providers experience heightened anxiety in formal investigative contexts. Safeguarding processes must not inadvertently retraumatise participants or create procedural barriers due to sensory or communication differences.

3.5.3 Where information-gathering determinations or payment withholding decisions are subject to review, access to stay powers should be available where appropriate to prevent disproportionate financial or operational harm pending review.

3.5.4 The Alliance notes the findings of the Royal Commission into the Robodebt Scheme, which highlighted the risks associated with insufficient scrutiny of executive decision-making and automated compliance processes. Expanded information-gathering and payment withholding powers must therefore be accompanied by procedural fairness protections and accessible review pathways to prevent systemic harm.

3.6 NDIS Provider Register

3.6.1 The expanded provider register may enhance transparency and participant safety.

Recommendations:

3.6.2 Safeguards should ensure:

- Accuracy and accessible correction mechanisms
- Contextual explanation of enforcement action
- Accessible publication formats
- Protection from unintended or disproportionate reputational harm.

4. Schedule 2 — Amendments Relating to NDIA Operations

Schedule 2 expands NDIA operational powers in relation to participant withdrawal, claim submission pathways, and plan variation. While these reforms are framed as improving integrity and participant experience, they significantly affect participant rights and administrative processes. Accordingly, strengthened operational flexibility must be matched with robust accessibility and procedural safeguards.

4.1 Withdrawal from the Scheme — Cooling-Off Period (Section 29A)

4.1.1 Support for Cooling-Off Safeguard

The Alliance supports the introduction of a 90-day cooling-off period following a request to withdraw from the Scheme. This is an important protective measure, particularly for participants who may make decisions during periods of distress, burnout or crisis.

However, the expansion of withdrawal requests to verbal, phone or in-person communication introduces new safeguarding risks that must be addressed legislatively.

4.1.2 Identified Safeguarding Risks

Autistic participants may:

- Exhibit acquiescence bias in interactions with authority figures
- Misinterpret yes/no questions or leading prompts
- Experience processing delays or shutdown during phone conversations
- Agree verbally to end a distressing interaction rather than express disagreement
- Fail to respond to written notices due to executive functioning barriers
- Miss correspondence entirely due to communication accessibility barriers

Under proposed subsection 29A(5), inaction results in deemed withdrawal. Silence or non-response does not necessarily indicate informed, voluntary and sustained consent.

Recommendations:

4.1.3 Required Legislative Safeguards

To ensure the cooling-off period operates as a genuine protection rather than a procedural formality, the Alliance recommends:

- (a) A verbal or in-person withdrawal request should not commence the cooling-off period unless confirmed in writing by the participant;
- (b) Withdrawal should not be deemed to occur solely due to inaction unless reasonable steps have been taken to confirm continued intention;
- (c) Supported decision-making assistance must be offered prior to withdrawal taking effect and this must be recorded;
- (d) Notices must be provided in accessible formats and reasonable steps taken to confirm receipt;
- (e) Only the participant or a properly appointed plan nominee may cancel or confirm withdrawal;
- (f) Supported decision-making safeguards must prevent inappropriate nominee override;
- (g) The NDIA should have authority to initiate extensions where vulnerability or communication barriers are evident;
- (h) Funding and supports must continue uninterrupted during the cooling-off period;
- (i) Access to independent advocacy must be proactively offered;

(j) A decision not to extend the cooling-off period should be reviewable where substantive interests are affected.

4.1.4 Required Safeguards

The Alliance recommends:

- (a) A verbal withdrawal request should not commence the cooling-off period unless confirmed in writing by the participant;
- (b) Withdrawal should not be deemed to occur solely due to inaction unless reasonable attempts have been made to confirm continued intention;
- (c) Supported decision-making assistance must be offered and recorded;
- (d) Notices must be provided in accessible formats and confirmation of receipt sought where practicable;
- (e) Refusal to extend a cooling-off period should be reviewable where substantive interests are affected.

Refinements should ensure:

- Only the participant or plan nominee may cancel withdrawal
- Supported decision-making safeguards prevent inappropriate nominee override
- NDIA may initiate extensions where vulnerability is evident
- Continuity of funding and supports during cooling-off
- Access to independent advocacy

4.2 Proposed Legislative Amendments to Section 29A

To give effect to these safeguards, the Alliance proposes:

Amendment 1 — Written Confirmation Requirement

Insert after subsection 29A(1):

(1A) If a request under subsection (1) is made otherwise than in writing, the request does not take effect unless:

- (a) the CEO has provided written notice under subsection (2); and
- (b) the participant confirms the request in writing within 14 days of receiving that notice.

Amendment 2 — Reasonable Confirmation Before Deemed Withdrawal

Insert after subsection 29A(4):

(4A) Before a participant is taken to have withdrawn under subsection (5), the CEO must take reasonable steps to confirm the participant's continued intention to withdraw.

(4B) Reasonable steps may include:

- (a) attempting contact using more than one approved communication method;
- (b) providing notice in accessible formats;
- (c) offering supported decision-making assistance.

Amendment 3 — Record of Supported Decision-Making

(4C) The CEO must record whether supported decision-making assistance was offered prior to the participant being taken to have withdrawn.

Amendment 4 — Reviewability

A decision not to extend the cooling-off period under subsection (4) should be a reviewable decision where it affects the participant's substantive rights or access to supports.

4.3 Approved Forms and Accessibility (Section 9A)

Where approved forms are represented online rather than published in static format, legislation should require:

- Compliance with recognised accessibility standards
- Availability in accessible formats
- Equivalent access for participants using assistive technology
- Clear and plain-language explanatory guidance

Accessibility obligations should be statutory rather than policy-based to prevent digital exclusion.

4.4 Claim Submission Pathways (Sections 45 and 45A)

The amendments allow the CEO to determine the manner in which claims must be submitted.

While this may improve integrity and risk detection, safeguards must ensure:

- 4.4.1 Claim submission pathways remain accessible to participants;
- 4.4.2 Participants are not required to use inaccessible digital platforms;
- 4.4.3 Alternative submission pathways remain available where accessibility barriers exist;
- 4.4.4 Decisions not to extend time for document provision under subsection 45(3D) are reviewable where they affect payment eligibility.

Given the financial consequences of non-payment, procedural decisions that effectively determine payment outcomes should not be insulated from review.

4.5 Electronic Claiming Systems

Where electronic processing is required, systems must:

- Maintain alternative submission pathways

- Mandate accessibility design standards
- Provide navigation supports and step-by-step guidance
- Avoid digital exclusion
- Allow disability-informed extensions where needed

Integrity objectives should not override accessibility obligations.

4.6 Plan Variation and Funding Reductions (Section 47A)

The amendments clarify that plan variations may increase or decrease funding totals. While this provides administrative clarity, funding reductions may destabilise Autistic participants who rely on consistent support relationships.

Safeguards should therefore include:

- Accessible consultation prior to reduction
- Supported decision-making processes
- Plain-language written reasons
- ART review rights
- Access to independent advocacy prior to implementation
- Continuity safeguards where reduction may create immediate risk

Given the impact on daily living supports, funding reduction decisions engage substantive rights and should be treated accordingly.

5. Real-Time Resolution and Early Intervention Safeguards

5.1 The Bill strengthens enforcement but does not establish structured real-time resolution mechanisms.

5.2 The Alliance recommends:

- An accessible rapid clarification mechanism
- Clear escalation thresholds distinguishing integrity risk from misunderstanding
- Dedicated neurodiversity-informed liaison officers
- Structured early resolution prior to formal enforcement where appropriate

5.3 Early resolution strengthens integrity by preventing avoidable escalation and preserving participant trust.

6. Co-Design and Governance

6.1 Insert a statutory co-design duty for development of subordinate legislation and regulatory tools.

6.2 Require transparent reporting on stakeholder feedback received, changes made in response, and reasons for decisions not adopted.

6.3 Establish cross-portfolio oversight to monitor unintended cost-shifting impacts.

7. CRPD Accountability and Enforcement Integrity

7.1 Positive Compatibility Duty

7.1.1 The Alliance recommends insertion of a statutory provision requiring that, in exercising powers and performing functions under the NDIS Act, the CEO and the Commissioner must act compatibly with Australia's obligations under the CRPD.

7.1.2 In the absence of a federal Human Rights Act, embedding a CRPD compatibility duty within the NDIS Act provides a proportionate accountability safeguard.

7.2 CRPD Impact Statements

7.2.1 Legislative instruments and regulatory determinations made under the Act should include a CRPD compatibility analysis.

7.2.2 The analysis should identify engaged Articles and explain how enforcement powers are exercised consistently with supported decision-making and dignity of risk.

7.3 Public Reporting

7.3.1 Establish annual public safeguarding reporting including disaggregated data on:

- Banning orders
- Anti-promotion orders
- Withheld payments
- Information notices
- Withdrawal decisions
- Plan funding reductions
- Review outcomes

7.3.2 Data should be disaggregated by disability type, including Autistic participants.

7.4 Independent Review

7.4.1 Expanded enforcement powers should be independently reviewed within three years of commencement.

7.4.2 Findings should be tabled in Parliament.

7.5 Non-Regression Principle

7.5.1 Nothing in the amended Act should authorise the exercise of powers in a manner that diminishes existing participant rights, access pathways or review protections.

8. Implementation Safeguards

8.1 Mandatory neurodiversity-affirming and trauma-informed training for regulators and NDIA decision-makers.

8.2 Risk-enablement guidance aligned with HISSD.

8.3 Small Provider Support Program.

8.4 Accessible regulatory materials, including Easy Read and AAC-compatible formats.

9. Legislative Continuity Safeguards

9.1 Information-gathering powers should not be unduly burdensome and should include annulment mechanisms where statutory thresholds are not met.

9.2 Significant instruments should not commence prior to completion of the parliamentary disallowance period.

9.3 Independent expert advisory mechanisms should support regulatory development.

10. Recommendations

The Australian Autism Alliance recommends that the Committee consider amendments and implementation measures to ensure that strengthened integrity reforms operate in a manner that protects participant rights, accessibility and market sustainability.

A. Human Rights and Legislative Safeguards

1. Insert a statutory duty requiring the NDIA CEO and the NDIS Quality and Safeguards Commissioner to act compatibly with Australia's obligations under the Convention on the Rights of Persons with Disabilities (CRPD).
2. Embed supported decision-making and dignity-of-risk principles as interpretive safeguards within the NDIS Act.
3. Insert an explicit non-regression clause to ensure that enforcement reforms do not diminish existing participant rights, access pathways or review protections.
4. Require CRPD compatibility analysis for legislative instruments and regulatory determinations made under the Act.
5. Establish an annual public safeguarding report with disaggregated data (including disability cohort impacts).
6. Require independent review of expanded enforcement and operational powers within three years of commencement, with findings tabled in Parliament.

B. Procedural Fairness and Review Rights

7. Provide Administrative Review Tribunal (ART) review rights for key enforcement and operational decisions, including banning orders, anti-promotion orders, information-gathering determinations, payment withholding decisions and funding reductions.
8. Ensure access to appropriate stay powers pending determination of review proceedings where continuation of a decision would cause disproportionate or irreparable harm.
9. Make refusal to extend time under subsection 45(3D) (document provision for claims) a reviewable decision where it affects payment eligibility.
10. Introduce structured real-time resolution pathways to allow early clarification of compliance or administrative issues prior to formal enforcement escalation.

C. Cooling-Off and Withdrawal Safeguards (Section 29A)

11. Strengthen cooling-off provisions to ensure that verbal withdrawal requests do not take effect without written confirmation.
12. Require reasonable steps to confirm participant intention before deemed withdrawal due to inaction.
13. Prevent inappropriate nominee override through supported decision-making safeguards.
14. Guarantee continuity of funding and supports during the cooling-off period.
15. Require supported decision-making assistance to be offered and recorded prior to withdrawal taking effect.
16. Make refusal to extend a cooling-off period reviewable where substantive interests are affected.

D. Accessibility and Administrative Inclusion

17. Mandate statutory accessibility requirements for online representations of approved forms (s9A(2)).
18. Require accessible claim submission pathways under sections 45 and 45A, including alternative submission options where digital barriers exist.
19. Require electronic claiming systems to meet recognised accessibility standards and avoid digital exclusion.

E. Proportionate Regulation and Market Sustainability

20. Insert a statutory proportionality duty requiring regulators to consider participant access, thin-market conditions and service continuity when exercising enforcement powers.
21. Implement a Small Provider Support Program offering compliance templates, technical assistance and transitional support to reduce unintended market exit, particularly among specialist and neurodivergent-led providers.

F. Safeguards for Enforcement and Information-Gathering Powers

22. Strengthen safeguards around information-gathering powers and payment withholding mechanisms, including clear statutory thresholds, procedural fairness protections and accessible review pathways.

23. Ensure enforcement and recovery mechanisms reflect lessons from the Royal Commission into the Robodebt Scheme, particularly regarding executive overreach and automated compliance risks.
24. Clarify criteria for harmful promotional conduct, including practices that promote neurodiversity-denying or identity-suppressing interventions.

G. Governance and Co-Design

25. Establish a statutory co-design duty requiring meaningful participation of Autistic and neurodivergent people in the development of regulatory guidance, compliance tools and safeguarding frameworks.

11. Conclusion

The Australian Autism Alliance supports strengthening regulatory integrity and safeguarding within the NDIS.

Autistic Australians face elevated safeguarding risks and will benefit from improved regulatory oversight. However, enforcement reform must be matched with procedural safeguards, accessibility protections and enforceable human rights duties to ensure that integrity reforms enhance — rather than undermine — participant autonomy, trust and equity.

With the refinements proposed in this submission, the Bill can achieve stronger regulation while preserving autonomy, accessibility and human rights compliance.

The Alliance welcomes further engagement with the Committee.