

ACD

Submission: Productivity Commission's inquiry into delivering quality care more efficiently

September 2025

Background

ACD is the Victorian advocacy service for children with disability and their families. We are a not-for-profit organisation led by, and for, families of children with disability.

Our vision is an inclusive community where children with disability and their families thrive.

Through our work we reach thousands of Victorian families raising children with disability each year. Their experiences inform our systemic advocacy.

ACD thank the Productivity Commission for the opportunity to respond to the *Delivering quality care more efficiently: Interim report*. This submission focuses on Information Request 1.2 and highlights the risk that a single quality and safety regulator across aged care, the NDIS, and veterans' care services may lack targeted oversight of children with disability.

For more information contact

Karen Dimmock CEO

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Safe and quality services for children with disability

ACD welcomes the opportunity to contribute to the Productivity Commission's inquiry into delivering quality care more efficiently. Ensuring children have consistent access to high-quality and safe services and supports is a central concern of our organisation and community.

We support the interim report's recommendations to:

- Establish a national screening clearance for workers in the care sector, and
- Introduce a suitability assessment for providers operating across aged care, the NDIS, veterans' care and early childhood education and care

Families we work with have consistently raised deep concerns that poor-quality and unsuitable providers are able to move unchecked between systems.

These reforms are vital safeguards to prevent unfit workers and providers from exploiting regulatory gaps between systems.

Risk of overlooking the needs and rights of children with disability in a single regulatory system

Recommendation

The Productivity Commission's final recommendations specify that a new, single regulatory system include specialised child-lens functions to ensure that oversight, and the standards for service safety, quality, and conduct, incorporate the rights and needs of children with disability

The needs and rights of children with disability are too often overlooked in both children's and disability policy.¹ This results in a lack of targeted planning and an increased risk of harm. Despite more than half of all NDIS participants being aged 18 and under², the current functions and processes of the NDIS Quality and Safeguards Commission and Framework apply only a limited child lens.

The Victorian Commission for Children and Young People has highlighted:³

- The need for child-specific safeguarding standards for all NDIS-funded services for children, including both registered and unregistered providers
- Limited guidance on the policies and processes that NDIS services should have in place to prevent harm and abuse of children and young people
- Gaps in protections for children whose parents are unable to make decisions in their best interests
- Insufficient training requirements for providers working with child NDIS participants, particularly older children

¹ Powell, M., et al. (2021). Children and safety in Australian policy: Implications for organisations and practitioners. *Australian Journal of Social Issues*, 56(1), 17-41.

² NDIS. (2025). *Explore data*. Available at [Explore data | NDIS](#). Accessed 27 August 2025.

³ Victorian Commission for Children and Young People. (2023). Submission to the NDIS Review. Available at [CCYP-Vic-submission-to-NDIS-Review.pdf](#)

The Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability similarly raised concerns about fragmentation between the NDIS Quality and Safeguards Commission and state and territory reportable conduct scheme operators. Its Final Report⁴ recommended:

- The joint development of guiding principles to support the efficient and effective handling of reportable incidents that are also allegations of reportable conduct
- The creation of consistent national guidance to help organisations understand and meet their obligations when managing and investigating allegations of reportable conduct and incidents involving children with disability

While critical child safety reviews and reforms are underway to improve information sharing, regulation, and reporting across jurisdictions, significant gaps remain in the capacity of the NDIS Quality and Safeguards Commission (and other regulatory systems) to provide effective oversight of the distinct needs of children with disability. These gaps include: the lack of reliable data, the absence of child-specific service standards, limited training requirements, and insufficient practical guidance on safeguarding and delivering responsive services.

ACD is concerned that a shift towards a single, adult-focused quality and safety regulator across aged care, the NDIS, and veterans' care will entrench existing shortcomings and further overlook the distinct needs and experiences of children with disability.

⁴ Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability. *Final Report Volume 11: Independent oversight and complaint mechanisms*. Available at [Final Report - Volume 11, Independent oversight and complaint mechanisms](#)