Document 1

s 22(1)(a)(ii)s 22(1)(a)(ii)

From: Committee, NDIS (SEN) <NDIS.joint@aph.gov.au>
Sent: Thursday, 26 March 2026 3:47 PM
To: s 22(1)(a)(ii)
Subject: JSCNDIS - Invitation to submit - Inquiry into the Integrity of the National Disability Insurance Scheme

Follow Up Flag: Follow up
Flag Status: Completed

26 March 2026

Ms Heather Cook
Chief Executive Officer
Australian Criminal Intelligence Commission

By email: s 22(1)(a)(ii) @acic.gov.au

Dear Ms Cook

Inquiry into the Integrity of the National Disability Insurance Scheme

On 23 March 2026, Senator the Hon Jenny McAllister, Minister for the National Disability Insurance Scheme (NDIS) proposed to the Joint Standing Committee on the NDIS (committee) that it conduct an inquiry into the integrity of the NDIS. The committee has agreed to inquire and report by **2 July 2026** on the following terms of reference:

(a) the nature and extent of non-compliance, including fraud and sharp practices, in the NDIS;

(b) the impacts of non-compliance on NDIS participants and their families;

(c) the effectiveness and adequacy of successive government policies to improve Scheme integrity, safeguard participants, and tackle non-compliance; and

(d) any legislative or other reforms required to strengthen Scheme integrity.

You can access more information about this new inquiry on the committee's website.

The committee invites the Australian Criminal Intelligence Commission to provide a written submission to the inquiry by **Friday, 24 April 2026.**

Please note that the committee intends to hold public hearings at the end of April 2026 and would appreciate the timely provision of submissions to facilitate its work.

The committee is seeking to publicise its work as widely as possible and would appreciate you referring this letter of invitation to any individual, group, or organisation that you think would like to contribute to the inquiry.

Making a submission

Submissions should include the name of the relevant inquiry – *Integrity of the NDIS*.

The committee is seeking written submissions in electronic form submitted online or sent by email to ndis.joint@aph.gov.au as an attached Adobe PDF or MS Word document. Alternatively, written submissions may be sent to:

Released under the Freedom of Information Act 1982 (Cth)

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

Submissions should include your name, phone number, and postal address so that we can contact you. Personal contact details are removed from submissions before their publication.

Further information on making a submission to a committee inquiry can be found on the Parliament website.

The committee secretariat can also assist you via phone (02) 6277 3083 or email ndis.joint@aph.gov.au. More information about this committee is available at: www.aph.gov.au/joint_ndis.

Requests for confidentiality

Please note that submissions are confidential until the committee releases them. You must not release your submission until the committee advises that it has accepted and released it publicly, by publishing it on the inquiry webpage. Submissions are protected by parliamentary privilege but the unauthorised release of them is not.

The committee will normally make submissions public unless there is a request for confidentiality. You can also request that the committee receive your submission as a 'name withheld' submission, where all personal identifiers are redacted before publication.

If you would like your submission or part of it to be kept confidential, or for your submission to be considered as name withheld, please say so clearly in the submission. The committee will consider requests for confidentiality, but it cannot make promises in advance. If you have concerns about confidentiality, I encourage you to call the secretariat to discuss this before lodging the submission.

Please contact the secretariat on the details below should you have any questions about the inquiry or submission process.

Yours sincerely

Dr Jane Thomson
Committee Secretary

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Document 2

s 22(1)(a)(ii)s 22(1)(a)(ii)

From: s 22(1)(a)(ii)
Sent: Tuesday, 31 March 2026 9:22 AM
To: s 22(1)(a)(ii)
Cc: s 22(1)(a)(ii)
Subject: RE: INPUT REQUIRED: By midday Tuesday 31 March - Inquiry into the Integrity of the NDIS [SEC=PROTECTED]
Attachments: s 47E(d) .PDF

PROTECTED

Hi Team

Thanks for taking the lead with this response. The key documents to assist are the below Talking Points, s 47E(d)

.

The main message I think should be that there are arrange of serious organised crime actors involved – from traditional SOC such as OMCGs, to professional fraud syndicates, and enabled by professional facilitators such as allied health professionals , s 47E(d) .

s 47E(d)

Other reports that may be of relevance have also been attached.

Happy to discuss if you have any queries.

Regards

s 22(1)(a)(ii)

s 22(1)(a)(ii)
Director | Serious Fraud
s 22(1)(a)(ii)
Australian Criminal Intelligence Commission | First Nations Country
s 22(1)(a)(ii)@acic.gov.au |+61s 22(1)(a)(ii)

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I acknowledge the Traditional Custodians of the lands and waters where we live and work, and pay my respects to Elders past, present and future

s 22(1)(a)(ii)

[redacted]

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s 22(1)(a)(ii)
Director | s 22(1)(a)(ii)
Australian Criminal Intelligence Commission
s 22(1)(a)(ii)@acic.gov.au | +61 s 22(1)(a)(ii)



I acknowledge the Traditional Custodians of the lands and waters where we live and work, and pay my respects to Elders past, present and future

s 22(1)(a)(ii)

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s 22(1)(a)(ii)

[redacted]

[redacted]

[redacted]

Document 3

s 22(1)(a)(ii)s 22(1)(a)(ii)

From: Rippon, Matt
Sent: Thursday, 26 March 2026 4:44 PM
To: s 22(1)(a)(ii) Meyer, Adam; Barrett, Angela
Cc: s 22(1)(a)(ii)

Subject: RE: For Decision - FRI 27 March 12PM - JSCNDIS - Invitation to submit - Inquiry into the Integrity of the National Disability Insurance Scheme - DUE: Friday, 24 April 2026 [SEC=PROTECTED]

PROTECTED

Hi s 22(1)

Thanks for this – I am supportive of us making a short submission. Agree our frame needs to be tight around ToR 1.

Regards

MR

Matthew Rippon
A/Chief Executive Officer
Australian Criminal Intelligence Commission | Ngunnawal Country
s 22(1)(a)(ii)@acic.gov.au
P: |+61s 22(1)(a)(ii) | M: +61s 22(1)(a)(ii)



I acknowledge the Traditional Custodians of the lands and waters where we live and work, and pay my respects to Elders past, present and future

From: s 22(1)(a)(ii) @acic.gov.au>
Sent: Thursday, 26 March 2026 4:54 PM
To: Rippon, Matt s 22(1)(a)(ii) @acic.gov.au>; Meyer, Adam s 22(1)(a)(ii) @acic.gov.au>; Barrett, Angela s 22(1)(a)(ii) @acic.gov.au>
Cc: s 22(1)(a)(ii)

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Subject: For Decision - FRI 27 March 12PM - JSCNDIS - Invitation to submit - Inquiry into the Integrity of the National Disability Insurance Scheme - DUE: Friday, 24 April 2026 [SEC=PROTECTED]
Importance: High

PROTECTED

Hi all

The Joint Standing Committee on the NDIS is conducting an inquiry into the integrity of the NDIS (at the proposal of Senator the Hon Jenny McAllister).

We have been invited to make a submission. Based on the terms of reference (mainly highlight) I think it is reasonable that we could, s 47C , prepare a short submission specific to SOC exploitation of NDIS and GPPs – s 47C

It presents an opportunity to raise agency profile, seeking your approval to prepare a short submission – or alternate views – **by 12pm Friday 27 March.**

Terms of reference:

(a) the nature and extent of non-compliance, including fraud and sharp practices, in the NDIS;

(b) the impacts of non-compliance on NDIS participants and their families;

(c) the effectiveness and adequacy of successive government policies to improve Scheme integrity, safeguard participants, and tackle non-compliance; and

(d) any legislative or other reforms required to strengthen Scheme integrity.

Should you agree, s 22(1) will lead coordination of the submission with s 22(1)(a)(ii).

s 22(1)(a)(ii)

s 22(1)(a)(ii)

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AUSTRALIAN CRIMINAL INTELLIGENCE COMMISSION

s 22(1)(a)(ii)

[redacted]

s 22(1)(a)(ii)

[redacted]

s 22(1)(a)(ii)

[redacted]

[redacted]

[redacted]

s 22(1)(a)(ii)

[redacted]

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Document 4

s 22(1)(a)(ii)

From: s 22(1)(a)(ii)
Sent: Thursday, 2 April 2026 11:48 AM
To: s 22(1)(a)(ii)
Cc: s 22(1)(a)(ii)
Subject: RE: INPUT REQUIRED: By midday Tuesday 31 March - Inquiry into the Integrity of the NDIS [SEC=PROTECTED]

Importance: High

PROTECTED

Thanks s 22(1)(a)(ii) and s 22(1)(a)(ii) and s 22(1)

s 22(1)(a)(ii) – I have reviewed and endorsed this.

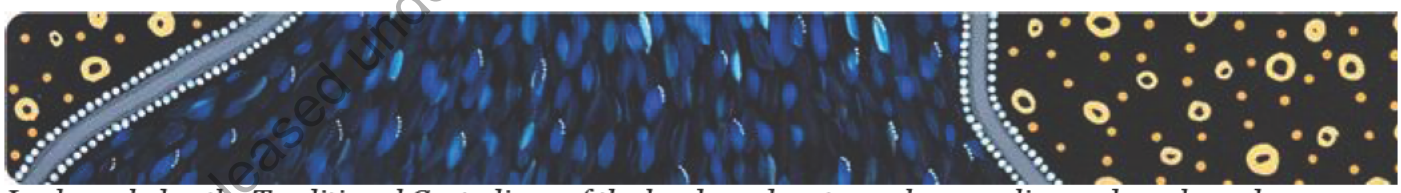
Some questions:

- s 22(1)(a)(ii)

Best regards,

s 22(1)(a)(ii)

s 22(1)(a)(ii)
Acting National Manager s 22(1)(a)(ii)
Australian Criminal Intelligence Commission | Ngunnawal Country
s 22(1)(a)(ii)@acic.gov.au |+61 s 22(1)(a)(ii)



I acknowledge the Traditional Custodians of the lands and waters where we live and work, and pay my respects to Elders past, present and future

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From: s 22(1)(a)(ii)
Sent: Wednesday, 1 April 2026 3:12 PM
To: s 22(1)(a)(ii)
Subject: FW: INPUT REQUIRED: By midday Tuesday 31 March - Inquiry into the Integrity of the NDIS [SEC=PROTECTED]

PROTECTED

Hi s 22(1)(a)(ii)

I've reviewed and made some subtle changes to the submission – this is due to s 22(1)(a)(ii) by 2pm tomorrow.

s 47C

Regards

s 22(1)(a)(ii)

s 22(1)(a)(ii)
Director | s 22(1)(a)(ii)
s 22(1)(a)(ii)
Australian Criminal Intelligence Commission | First Nations Country
s 22(1)(a)(ii)@acic.gov.au |+61 s 22(1)(a)(ii)



I acknowledge the Traditional Custodians of the lands and waters where we live and work, and pay my respects to Elders past, present and future

From: s 22(1)(a)(ii) @acic.gov.au>
Sent: Wednesday, 1 April 2026 12:40 PM
To: s 22(1)(a)(ii) @acic.gov.au>
Cc: s 22(1)(a)(ii)
Subject: RE: INPUT REQUIRED: By midday Tuesday 31 March - Inquiry into the Integrity of the NDIS [SEC=PROTECTED]

PROTECTED

Hi s 22(1)(a)(ii) and all,

Based on the all the info you sent through, I've pulled together a draft submission for your review. s 47C wonderful – thank you.

I have tried to keep the submission as high level as possible so as not to breach any sensitives but you will be best placed to make that assessment as the submission must be at OFFICIAL. So please feel free to mark up the submission in track changes: s 22(1)(a)(ii)

Noting the tight timeframes, we'll need to provide this submission to the CEO and deputies by Wednesday 8 April at the latest, ahead of it being submitted s 47E(d) I know I'm asking a lot but if there is any chance that you review and **provide any comments/changes back by 2pm tomorrow**, I can then update and provide for your final review and band 1 and 2 clearance on Tuesday morning next week.

Don't hesitate to reach out if you have any questions and please feel free to make any changes you need to the submission.

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Thanks so much,
s 22(1)

From: s 22(1)(a)(ii) @acic.gov.au>
Sent: Tuesday, 31 March 2026 9:52 AM
To: s 22(1)(a)(ii)
Subject: RE: INPUT REQUIRED: By midday Tuesday 31 March - Inquiry into the Integrity of the NDIS [SEC=PROTECTED]

PROTECTED

Hi Team

Thanks for taking the lead with this response. The key documents to assist are the below s 22(1)(a)(ii), s 47E(d)

The main message I think should be that there are arrange of serious organised crime actors involved – from traditional SOC such as OMCGs, to professional fraud syndicates, and enabled by professional facilitators such as allied health professionals , s 22(1)(a)(ii), s 47E(d) .

The key methodology is the use of coercion, particularly through violence and cash incentives: s 47E(d)

Other reports that may be of relevance have also been attached.

Happy to discuss if you have any queries.

Regards
s 22(1)(a)(ii)

s 22(1)(a)(ii)
Director | Serious Fraud
s 22(1)(a)(ii)
Australian Criminal Intelligence Commission | First Nations Country
s 22(1)(a)(ii) @acic.gov.au |+61 s 22(1)(a)(ii)



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From: s 22(1)(a)(ii) @acic.gov.au>
Sent: Friday, 27 March 2026 9:28 AM
To: s 22(1)(a)(ii)
Subject: INPUT REQUIRED: By midday Tuesday 31 March - Inquiry into the Integrity of the NDIS [SEC=OFFICIAL]
Importance: High

OFFICIAL

Hi s 22(1)(a)(ii)

I'm coordinating ACIC's written submission to the Joint Standing Committee on the NDIS inquiry into the Integrity of the NDIS, with submissions due to the Committee on 24 April 2026. For ACIC, s 47C s 47C on ToR (a): the nature and extent of non-compliance, including fraud and sharp practices, in the NDIS (the full terms of reference are set out in the below email).

In addition to the Committee deadline, s 22(1)(a)(ii) we're working to quite tight internal timeframes. This is further complicated by the Easter public holidays.

Given your role and expertise in this space, I'd really welcome whatever input you think would be most valuable to help the Committee understand the NDIS threat picture from an ACIC perspective. By way of very high-level guidance only, this could include any observations you consider important on the types of non-compliance being seen, the scale or patterns emerging from intelligence, organised crime involvement, detection challenges, or ACIC's intelligence contribution – noting of course any information included will need to be suitable for release at the OFFICIAL level.

While we would of course welcome any observations you may have on the other s 47C

To allow time to pull the submission together, circulate back to yourself and internally for review, and progress it through the CEO and Deputies before it goes to s 22(1)(a)(ii), I'd really appreciate any **input by midday Tuesday 31 March,** if possible. I do apologise for the tight turnaround – we only received the Committee's request after 4pm yesterday.

If you could provide some key narrative points, themes or insights you think would strengthen the submission that would be wonderful.

Let me know if you have any questions, happy to chat.

Thanks very much,
s 22(1)

AUSTRALIAN CRIMINAL INTELLIGENCE COMMISSION
s 22(1)(a)(ii)
Director | s 22(1)(a)(ii)
Australian Criminal Intelligence Commission
s 22(1)(a)(ii) @acic.gov.au | +61 s 22(1)(a)(ii)

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s 22(1)(a)(ii)

[redacted]

s 22(1)(a)(ii)

[redacted]

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s 22(1)(a)(ii)

[redacted]

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Document 5

s 22(1)(a)(ii)

From: s 22(1)(a)(ii)
Sent: Tuesday, 7 April 2026 8:49 PM
To: s 22(1)(a)(ii)
Subject: RE: ACIC submission to the Inquiry into the Integrity of the NDIS [SEC=OFFICIAL]

OFFICIAL

Thanks very much s 22(1)(a)(ii) – its looking good.

In the interests of time, I made edits and comments in the last revision, but then accepted them so I could progress for review.

I will send the submission to Matt and Adam s 47E(d) – if you could address tomorrow.

Thanks

s 22(1)(a)(ii)

From: s 22(1)(a)(ii)
Sent: Thursday, 2 April 2026 5:22 PM
To: s 22(1)(a)(ii)
Cc: s 22(1)(a)(ii)
Subject: FW: ACIC submission to the Inquiry into the Integrity of the NDIS [SEC=OFFICIAL]

OFFICIAL

Hi s 22(1)(a)(ii)

The ACIC submission to the Joint Standing Committee on the NDIS Inquiry into the *Integrity of the NDIS* has been reviewed and cleared by s 22(1)(a)(ii)

To assist consideration, the terms of reference for the inquiry are set out below:

a) the nature and extent of non-compliance, including fraud and sharp practices, in the NDIS;
b) the impacts of non-compliance on NDIS participants and their families;
c) the effectiveness and adequacy of successive government policies to improve Scheme integrity, safeguard participants, and tackle non-compliance; and
d) any legislative or other reforms required to strengthen Scheme integrity.

Submissions are due with the Committee by 24 April 2026.

Thanks so much,

s 22(1)

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s 22(1)(a)(ii)
Director | s 22(1)(a)(ii)
Australian Criminal Intelligence Commission
s 22(1)(a)(ii)@acic.gov.au | +61 s 22(1)(a)(ii)



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s 22(1)(a)(ii)

s 22(1)(a)(ii)

[redacted]

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Document 6

s 22(1)(a)(ii) s 22(1)(a)(ii)

From: Meyer, Adam
Sent: Friday, 3 April 2026 12:58 PM
To: s 22(1)(a)(ii)
Cc: s 22(1)(a)(ii)
Subject: RE: For ED review: By 2pm Tuesday 7 April: ACIC submission to the Inquiry into the Integrity of the NDIS [SEC=OFFICIAL]

Categories: Review and Inquiry submissions

OFFICIAL

Hi all,

Thanks for this – it's a good submission.

I have now reviewed and made a few additional updates. s 22(1)(a)(ii) s 22(1)(a)(ii), we will need to progress to Matt in his substantive capacity for review next week, before providing to Heather.

Best,

Ad

Adam Meyer
Executive Director s 22(1)(a)(ii)
Australian Criminal Intelligence Commission | Ngunnawal Country
s 22(1)(a)(ii)@acic.gov.au
P: +61 s 22(1)(a)(ii) | M: s 22(1)(a)(ii)
s 22(1)(a)(ii) @acic.gov.au

From: s 22(1)(a)(ii)
Sent: Thursday, 2 April 2026 5:00 PM
To: s 22(1)(a)(ii) ; Meyer, Adam
Cc: s 22(1)(a)(ii)
Subject: RE: For ED review: By 2pm Tuesday 7 April: ACIC submission to the Inquiry into the Integrity of the NDIS [SEC=OFFICIAL]

OFFICIAL

Tks s 22(1)(a) - I have reviewed the s 22(1)(a) and, provided some minor track changes are agreed, this is endorsed for s 22(1)(a)(ii) consideration

s 22(1)(a)

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From: s 22(1)(a)(ii) @acic.gov.au>
Sent: Thursday, 2 April 2026 1:19 PM
To: s 22(1)(a)(ii) Meyer, Adam s 22(1)(a)(ii) @acic.gov.au>
Cc: s 22(1)(a)(ii)
Subject: For ED review: By 2pm Tuesday 7 April: ACIC submission to the Inquiry into the Integrity of the NDIS [SEC=OFFICIAL]

OFFICIAL

Hi s 22(1)(a)(ii)

On 23 March 2026, Senator the Hon Jenny McAllister, Minister for the National Disability Insurance Scheme (NDIS) proposed to the Joint Standing Committee on the NDIS (committee) that it conduct an inquiry into the integrity of the NDIS. The committee has agreed to inquire and report by **2 July 2026** on the following terms of reference:

(a) the nature and extent of non-compliance, including fraud and sharp practices, in the NDIS;

(b) the impacts of non-compliance on NDIS participants and their families;

(c) the effectiveness and adequacy of successive government policies to improve Scheme integrity, safeguard participants, and tackle non-compliance; and

(d) any legislative or other reforms required to strengthen Scheme integrity.

You can access more information about this new inquiry on the committee's website.

Seeking your review of s 22(1)(a)(ii)
s 47E(d)
. **Could you please advise?**

@Meyer, Adam – looping you in s 22(1)(a)(ii) .

Due back to s 22(1)(a)(ii) by **2pm 7 April** s 22(1)(a)(ii) review.

Kind regards,
s 22(1)(a)(ii)

s 22(1)(a)(ii)
Executive Officer to
Executive s 22(1)(a)(ii)
@acic.gov.au

s 22(1)(a)(ii)
acic.gov.au

Australian Criminal Intelligence Commission | Ngunnawal Country
s 22(1)(a)(ii) @acic.gov.au |+61 s 22(1)(a)(ii)



I acknowledge the Traditional Custodians of the lands and waters where we live and work, and pay my respects to Elders past, present and future

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From: s 22(1)(a)(ii) @acic.gov.au>
Sent: Thursday, 2 April 2026 1:12 PM
To: s 22(1)(a)(ii) @acic.gov.au>
Cc: s 22(1)(a)(ii)

Subject: By 2pm Tuesday 7 April s 22(1)(a)(ii) review: ACIC submission to the Inquiry into the Integrity of the NDIS [SEC=OFFICIAL]

OFFICIAL

Hi s 22(1)(a)(ii)

The submission is finalised and ready for review and clearance by s 22(1)(a)(ii). s 22(1)(a)(ii)

To assist consideration, the terms of reference for the inquiry into the integrity of the NDIS are set out below:

(a) the nature and extent of non-compliance, including fraud and sharp practices, in the NDIS;

(b) the impacts of non-compliance on NDIS participants and their families;

(c) the effectiveness and adequacy of successive government policies to improve Scheme integrity, safeguard participants, and tackle non-compliance; and

(d) any legislative or other reforms required to strengthen Scheme integrity.

Also, would s 47E(d) ?

Thanks so much,

s 22(1)

s 22(1)(a)(ii)
Director | s 22(1)(a)(ii)
Australian Criminal Intelligence Commission
s 22(1)(a)(ii) @acic.gov.au | +61 s 22(1)(a)(ii)



I acknowledge the Traditional Custodians of the lands and waters where we live and work, and pay my respects to Elders past, present and future

s 22(1)(a)(ii)

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s 22(1)(a)(ii)

[redacted]

Released under the Freedom of Information Act 1982 (Vic)

s 22(1)(a)(ii) [redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

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Document 7

s 22(1)(a)(ii)s 22(1)(a)(ii)

From: s 22(1)(a)(ii)
Sent: Wednesday, 8 April 2026 8:49 AM
To: Meyer, Adam; Rippon, Matt
Cc: s 22(1)(a)(ii)
Subject: RE: For review: JSCNDIS - Invitation to submit - Inquiry into the Integrity of the National Disability Insurance Scheme - DUE: Friday, 24 April 2026 [SEC=OFFICIAL]

OFFICIAL

Thanks Ad – I completely missed your s 22(1)(a)(ii) note from Friday sorry!

I have made a s 47C

s 22(1)a

From: Meyer, Adam
Sent: Wednesday, 8 April 2026 8:57 AM
To: s 22(1)(a)(ii) ; Rippon, Matt
Cc: s 22(1)(a)(ii)
Subject: RE: For review: JSCNDIS - Invitation to submit - Inquiry into the Integrity of the National Disability Insurance Scheme - DUE: Friday, 24 April 2026 [SEC=OFFICIAL]

OFFICIAL

Hi s 22(1)(a)(ii)

I had the chance to review and make a few amendments on Friday, s 47C

s 47C

. Otherwise looks good to me.

s 47E(d)

Best,

Ad

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Adam Meyer
Executive Director s 22(1)(a)(ii) [redacted]
Australian Criminal Intelligence Commission | Ngunnawal Country
s 22(1)(a)(ii) @acic.gov.au
P: +61 s 22(1)(a)(ii) | M: s 22(1)(a)(ii)
Executive Support: s 22(1)(a)(ii) @acic.gov.au

From: s 22(1)(a)(ii) @acic.gov.au>
Sent: Tuesday, 7 April 2026 9:22 PM
To: Rippon, Matt s 22(1)(a)(ii) @acic.gov.au>; Meyer, Adam s 22(1)(a)(ii) @acic.gov.au>
Cc: s 22(1)(a)(ii) [redacted] National Disability Insurance Scheme - DUE: Friday, 24 April 2026 [SEC=OFFICIAL]
Importance: High

OFFICIAL

Hi Matt

As flagged, please find the draft submission to the Joint Standing Committee on the National Disability Insurance Scheme *Inquiry into the Integrity of the National Disability Insurance Scheme* at s 22(1)(a)(ii) [redacted] for your consideration.

@Meyer, Adam – this was cleared by s 22(1)(a)(ii) [redacted]

Review at your earliest convenience is appreciated – we need to clear via CEO s 22(1)(a)(ii) by end of week.

Thanks and happy to discuss.

s 22(1)(a)(ii) [redacted]

From: s 22(1)(a)(ii) @acic.gov.au>
Sent: Thursday, 26 March 2026 4:31 PM
To: s 22(1)(a)(ii) [redacted]
Cc: s 22(1)(a)(ii) [redacted]
Subject: JSCNDIS - Invitation to submit - Inquiry into the Integrity of the National Disability Insurance Scheme - DUE: Friday, 24 April 2026 [SEC=OFFICIAL]

OFFICIAL

Hi s 22(1)(a)(ii) [redacted]

The Joint Standing Committee on the National Disability Insurance Scheme are inviting ACIC to make a submission on the **Inquiry into the Integrity of the National Disability Insurance Scheme**.

The closing date for written submissions is **Friday, 24 April 2026**, s 22(1)(a)(ii) [redacted]

Please let me know if you require anything further.

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Many thanks

s 22(1)(a)(ii)
Assistant Director, s 22(1)(a)(ii)
Australian Criminal Intelligence Commission | Ngunnawal Country
s 22(1)(a)(ii) @acic.gov.au | s 22(1)(a)(ii)

s 22(1)(a)(ii)

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s 22(1)(a)(ii)

[redacted]

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AUSTRALIAN CRIMINAL INTELLIGENCE COMMISSION

SUBMISSION

Joint Standing Committee on the National Disability Insurance Scheme (NDIS) Inquiry into the Integrity of the NDIS

DRAFT
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INTRODUCTION

The Australian Criminal Intelligence Commission (ACIC) welcomes the opportunity to provide a submission to the Joint Standing Committee on the National Disability Insurance Scheme (NDIS) Inquiry into the Integrity of the NDIS.

The ACIC is Australia's sole agency with an exclusive legislated mandate to combat serious and organised crime (SOC). We play a central role in protecting Australia from criminal exploitation by providing high-quality criminal intelligence that informs operational decision-making, shapes policy and regulatory setting, and supports coordinated national responses across jurisdictions and sectors.

In fulfilling this role, the ACIC:

- provides unique, actionable and insightful criminal intelligence to partners and advice to government on SOC – including where it has a transnational dimension – through the collection and analysis of information and data on complex offending patterns, criminal business models, and criminal groups, networks and individuals across multiple crime vectors
- undertakes investigations and operations for purposes including identifying vulnerabilities in particular networks and systems, and collecting and disseminating intelligence – as well as evidence of SOC related offences – to facilitate enforcement, prevention, disruption and regulation activities
- provides national policing information systems and services to law enforcement and intelligence partners to keep them – and the Australian community – safe
- delivers background checking services to support employment or entitlement decisions and to maintain community safety.

OFFICIAL

THE EVOLVING SERIOUS AND ORGANISED CRIME ENVIRONMENT IMPACTING AUSTRALIA

Australia's SOC environment is becoming more complex, networked and damaging to the nation's economic, social and security interests. While illicit drugs remain the largest source of criminal revenue, contemporary SOC groups are highly opportunistic and increasingly diversified. They target any market where profit can be generated at scale, including illicit tobacco and weapons, cyber-enabled fraud and scams, human exploitation, and the systematic defrauding of government-funded programs. This evolution reflects a fundamental shift in the criminal landscape: SOC is no longer confined to traditional crime markets but is embedded across legitimate systems, services and supply chains that underpin everyday life in Australia.

The ACIC assesses that today's SOC networks operate as borderless, decentralised and digitally enabled enterprises, demonstrating the agility and sophistication of multinational businesses. Senior criminal figures often reside offshore, directing activity remotely through encrypted communications, digital platforms and trusted intermediaries. These networks rely on professional facilitators, complex corporate structures and digital money-laundering mechanisms to conceal their activities, move profits and evade detection. Technology has become a force multiplier – enabling SOC groups to scale operations rapidly, adapt quickly to regulatory change and exploit vulnerabilities across both physical and digital environments.

The scale of harm associated with this threat has grown significantly. The Australian Institute of Criminology estimates the cost of serious and organised crime to Australia reached up to $82.3 billion in 2023-24, equivalent to 3.2 per cent of GDP. Beyond direct economic losses, SOC activity undermines community safety, erodes trust in institutions, distorts legitimate markets and places sustained pressure on government services. As criminal enterprises increasingly converge with the legal economy, they amplify systemic vulnerabilities and entrench their resilience – challenging traditional intelligence, regulatory and law enforcement approaches.

Within this environment, government-funded programs that involve large public expenditure, complex service delivery models and vulnerable cohorts are particularly attractive targets for exploitation. The NDIS sits squarely within this risk profile. SOC actors are known to seek opportunities where oversight can be circumvented, where intermediaries or insiders can be leveraged, and where criminal activity can be disguised as legitimate service provision. This broader SOC context is critical to understanding the nature and extent of non-compliance in the NDIS – fraud and sharp practices are not occurring in isolation – but as part of a wider, evolving criminal ecosystem that actively targets public funds and exploits systemic weaknesses for profit.

Accordingly, addressing integrity risks in the NDIS requires an understanding of the contemporary SOC threat – one characterised by adaptability, convergence with legitimate systems, and exploitation at scale. An intelligence-led approach that illuminates hidden networks, new and evolving patterns of exploitation, and cross-sector linkages is essential to supporting effective disruption, policy hardening and the long-term protection of the NDIS and its participants.

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THE NATURE AND EXTENT OF NON-COMPLIANCE, INCLUDING FRAUD AND SHARP PRACTICES IN THE NDIS

The ACIC assesses that non-compliance in the NDIS extends beyond isolated or opportunistic misuse and includes deliberate fraud and sharp practices linked to broader criminal activity. Analysis indicates that SOC actors seek to exploit the NDIS in ways consistent with a wider pattern of targeting government-funded programs and public expenditure.

Nature of non-compliance

ACIC analysis indicates that….

Extent and scale of non-compliance

While precise quantification of NDIS fraud is inherently challenging, available indicators suggest the extent of non-compliance is…..

Sharp practices and regulatory exploitation

The ACIC has observed sharp practices that exploit regulatory….

Intelligence-informed understanding of non-compliance

As Australia's national criminal intelligence agency, the ACIC supports a comprehensive understanding of NDIS non-compliance by integrating intelligence, financial, regulatory and law enforcement information across government. This approach assists……..

ACIC analysis indicates that non-compliance in the NDIS includes serious fraud and sharp practices linked to broader criminal activity, involves repeat and cross-program actors, and exposes the Scheme to significant integrity risks. This threat profile is consistent with the contemporary serious and organised crime environment, in which criminal groups actively seek to exploit large, complex and well-funded public programs for profit.

CONCLUSION

Integrity risks within the NDIS are occurring in the context of a broader and increasingly sophisticated SOC environment. Non-compliance in the NDIS extends beyond isolated misuse and includes deliberate fraud and sharp practices that, in some cases, form part of wider criminal activity targeting government-funded programs. These risks are amplified by the scale and complexity of the Scheme, service delivery models that can be exploited, and the convergence of criminal activity with legitimate systems.

Addressing these risks requires a sustained, intelligence-informed and coordinated response across government. As demonstrated through intelligence-led analysis and multi-agency outcomes, including through the Fraud Fusion Taskforce, effective protection of the NDIS depends on visibility across jurisdictions, sectors and programs, and the ability to identify emerging patterns of exploitation before harm escalates. The ACIC will continue to support these efforts by providing

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unique, actionable and insightful criminal intelligence to inform decision-making, strengthen regulatory environments, and protect the long-term integrity of the NDIS and the safety of its participants.

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AUSTRALIAN CRIMINAL INTELLIGENCE COMMISSION

SUBMISSION

Joint Standing Committee on the National Disability Insurance Scheme (NDIS) Inquiry into the Integrity of the NDIS

DRAFT
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The Australian Criminal Intelligence Commission (ACIC) welcomes the opportunity to provide a submission to the Joint Standing Committee on the National Disability Insurance Scheme (NDIS) Inquiry into the Integrity of the NDIS.

The ACIC is Australia's national criminal intelligence agency with an exclusive legislated mandate to combat serious and organised crime (SOC). The ACIC plays a central role in protecting Australia from criminal exploitation by providing high-quality criminal intelligence that informs operational decision-making, shapes policy and regulatory settings, and supports coordinated national responses across jurisdictions and sectors.

In fulfilling this role, the ACIC:

- provides unique, actionable and insightful criminal intelligence to partners and advice to government on SOC – including where it has a transnational dimension – through the collection and analysis of information and data on complex offending patterns, criminal business models, and criminal groups, networks and individuals across multiple crime vectors
- undertakes investigations and operations for purposes including identifying vulnerabilities in particular networks and systems, and collecting and disseminating intelligence – as well as evidence of SOC related offences – to facilitate enforcement, prevention, disruption and regulation activities
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Today's SOC networks operate as decentralised, digitally enabled enterprises, frequently spanning multiple jurisdictions. Senior criminal figures may reside offshore while directing activity remotely through encrypted communications, digital platforms and trusted intermediaries. These networks rely on complex business structures and sophisticated financial arrangements to move and conceal proceeds, enabling them to adapt quickly to regulatory change and exploit vulnerabilities across both physical and digital environments. Technology has become a key enabler, allowing criminal groups to scale operations, reduce exposure and maintain resilience.

The scale of harm associated with this threat has grown significantly. The Australian Institute of Criminology estimates the cost of SOC to Australia reached up to $82.3 billion in 2023-24, equivalent to 3.2 per cent of GDP. Beyond direct economic losses, SOC activity undermines community safety, erodes trust in institutions, distorts legitimate markets and places sustained pressure on government services. As criminal enterprises increasingly embed themselves within lawful economic activity, they amplify systemic vulnerabilities and challenge traditional intelligence, regulatory and enforcement approaches.

In this environment, government-funded programs involving large public expenditure, complex delivery arrangements and vulnerable cohorts are particularly attractive targets. The NDIS sits squarely within this risk profile. SOC actors actively seek opportunities where oversight can be circumvented, intermediaries leveraged and criminal activity disguised as legitimate service provision. Understanding this broader SOC context is critical to assessing non-compliance in the NDIS – fraud and sharp practices are not occurring in isolation, but as part of a wider criminal ecosystem that targets public funds and exploits structural weaknesses for profit.

Accordingly, addressing integrity risks in the NDIS requires an understanding of the contemporary SOC threat – one characterised by adaptability, convergence with legitimate systems and exploitation at scale. An intelligence-led approach that identifies emerging patterns, hidden networks and cross-sector linkages is essential to supporting effective disruption, policy hardening and the long-term protection of the NDIS and its participants.

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INTEGRITY OF THE NATIONAL DISABILITY INSURANCE SCHEME

ACIC analysis indicates that non-compliance within the NDIS extends beyond isolated or opportunistic misuse and includes deliberate fraud, sharp practices and organised exploitation consistent with broader SOC methodologies. These behaviours have persisted over time and, in some cases, become increasingly sophisticated, s 47C [redacted]. Understanding the nature, extent and impacts of this non-compliance is critical to safeguarding participants, maintaining public confidence and protecting the long-term integrity of the NDIS.

Nature and extent of non-compliance, including fraud and sharp practices

ACIC analysis indicates that non-compliance within the NDIS occurs across a continuum, ranging from sharp practices at the margins of compliance to serious and organised fraud. Intelligence and regulatory analysis shows that fraudulent conduct commonly includes false or inflated claims for supports that are not delivered, claims submitted while participants are hospitalised or incarcerated, and claims made against expired ~~or inactive~~ plans. In more serious cases, collusive arrangements have been identified between providers and participants, nominees or family members, including the provision of cash or other inducements to facilitate fraudulent access to the Scheme or ongoing misuse of participant plans.

The misuse of NDIS funds is a recurring feature of serious non-compliance. This includes large cash withdrawals, asset purchases and financial transactions that are inconsistent with the delivery of disability supports and indicative of efforts to obscure the origin or use of Scheme funds. Such conduct diverts funding away from intended supports, undermines the integrity of the Scheme and erodes public confidence in the NDIS.

Of particular concern is the involvement of SOC actors in exploiting the NDIS. The ACIC assesses that a range of criminal entities – including traditional organised crime groups, professional fraud syndicates and scheme-hopping networks – have established or infiltrated NDIS providers. These actors exploit the Scheme to generate income, launder illicit proceeds and conceal asset ownership, often using criminal business models observed across other Commonwealth payment and regulatory programs. This indicates that NDIS exploitation frequently forms part of broader, repeat offending rather than isolated misconduct.

A central enabling methodology identified in ACIC analysis is the use of cash incentives, or "kickbacks", to participants, nominees or family members. These arrangements operate along a spectrum ranging from knowing collusion to coercion, and the ACIC assesses that some participants are likely unaware they are involved in fraudulent activity. In coercive cases, intimidation and threats of physical violence have been used to compel compliance, particularly against participants with physical or cognitive impairments.

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Professional facilitation is a recurring feature of these exploitation models. In some cases, allied health professionals and other trusted intermediaries assist unsuitable providers to gain entry to the NDIS, pass audits or inflate participant funding, embedding sharp practices within otherwise legitimate professional and service delivery environments. This facilitation can include the preparation of false or exaggerated documentation to support access or higher funding, and materially increases the capacity of organised fraud actors to generate and sustain non-compliant activity within the Scheme.

While the precise quantum of fraud within the NDIS cannot be reliably quantified, information suggests that the extent of non-compliance is material and, in some cases, systemic. Analysis of providers subject to banning, suspension or serious regulatory action shows that a significant proportion exhibited historical risk indicators prior to entering the Scheme, including prior fraud convictions, adverse findings in other government programs, suspicious financial activity and poor engagement with the taxation system. In many cases, these indicators were identifiable before entry to the NDIS, suggesting missed opportunities for earlier intervention.

Impacts on participants and families

Non-compliance within the NDIS has direct and tangible impacts on participants and their families. Weaknesses in provider suitability and screening can allow unsuitable or criminally-linked providers to operate within the Scheme, increasing the risk that participants are exposed to poor-quality care, exploitation, or services that are not delivered as intended. Where oversight is limited and funding can be accessed without meaningful scrutiny, these risks are heightened, particularly for participants who rely heavily on providers to manage or deliver their supports.

Fraudulent and non-compliant conduct also diverts Scheme funding away from legitimate supports, undermining participants' safety, wellbeing and independence. In some cases, participants may be drawn into collusive arrangements – knowingly or unknowingly – exposing them to financial, legal and personal harm. s 47C [redacted]

These harms are compounded where organised exploitation models rely on coercion. ACIC analysis indicates that participants from non-English speaking backgrounds, those with limited support networks, and those with significant physical or cognitive impairments may be particularly vulnerable. In coercive cases, intimidation or threats of violence can be used to compel compliance, undermining participants' ability to engage independently with the National Disability Insurance Agency (NDIA) and increasing the risk of ongoing harm. Over time, such exploitation damages confidence in the Scheme and creates uncertainty and distress for participants and families seeking safe and reliable support.

s 47C [redacted]

Over time, a range of policy, regulatory and operational measures have been implemented to strengthen NDIS integrity, including enhanced compliance activity and increased inter-agency

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cooperation. The ACIC contributes to these efforts as a member of the Fraud Fusion Taskforce (FFT) and host of the Fraud Fusion Centre, which includes seconded members from various FFT agencies. The ACIC is working alongside partner agencies to integrate intelligence and regulatory information and target serious and organised fraud affecting the NDIS. These measures have improved the detection and disruption of fraud, particularly among registered providers and cohorts identified as higher risk.

ACIC analysis indicates that elements of the broader NDIS integrity framework face challenges in keeping pace with an evolving threat environment. In particular, structural features such as reliance on self-declaration and limited visibility of emerging risk during application process can be exploited by SOC actors. Where adverse intelligence holdings or concerning patterns of behaviour are relevant to suitability assessments, these constraints may limit the effectiveness of timely intervention.

Similar challenges arise in relation to unregistered providers. Unregistered providers can lawfully deliver services to self-managed and plan-managed participants while operating outside many of the suitability, registration and ongoing compliance requirements that apply to registered providers. Given the scale of participant access to this cohort, ACIC analysis suggests this represents a material and not yet fully understood exposure for the Scheme. Reporting indicates that unregistered provider arrangements are frequently used by higher-risk actors to reduce scrutiny while maintaining access to NDIS funding.

Fraud risks in the NDIS are also evident in a broader, whole-of-government context. ACIC analysis identifies repeat and cross-program offending, where individuals and networks previously subject to compliance or enforcement action in other Commonwealth programs subsequently re-emerge in the NDIS. This pattern highlights the challenges posed by fragmented information-sharing arrangements and the absence of a consolidated, cross-program view of provider risk and suitability frameworks.

s 47C [redacted]

[redacted]

Risks are most pronounced in parts of the Scheme where providers operate with limited checks or oversight, increasing exposure to repeat or organised non-compliance. In such contexts, approaches that improve visibility and monitoring – particularly where funding levels are high or delivery arrangements reduce transparency – may assist in reducing exploitation of the Scheme. More consistent consideration of relevant compliance, enforcement and historical risk information across government could further support earlier detection and prevention of these risks.

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Maintaining integrity settings that are responsive to changing threats, informed by intelligence and proportionate to risk supports participant protection, public confidence and the long-term sustainability of the NDIS. As Australia's national criminal intelligence agency, the ACIC will continue to support these efforts by integrating intelligence, financial, regulatory and law-enforcement information to inform a shared, whole-of-government understanding of emerging risks.

CONCLUSION

Non-compliance within the NDIS reflects the characteristics of a SOC threat environment, in which criminal actors actively seek to exploit large, complex and well-funded public programs for profit. s 47C [redacted]

Addressing these risks requires a sustained, intelligence-informed and coordinated approach across government. Effective protection of the NDIS depends on the ability to identify emerging patterns of exploitation, share relevant risk information across programs and jurisdictions, and intervene earlier to prevent harm to participants and misuse of public funds. As Australia's national criminal intelligence agency, the ACIC will continue to support these efforts by providing integrated intelligence and analysis to inform policy, regulatory and operational responses, and to safeguard the long-term integrity of the Scheme and the safety of those who rely on it.

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Document 10

AUSTRALIAN CRIMINAL INTELLIGENCE COMMISSION

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THE EVOLVING SERIOUS AND ORGANISED CRIME ENVIRONMENT IMPACTING AUSTRALIA

s 22(1)(a)(ii) [redacted]

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Commented [NS2]: What does "sharp practices" mean?

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[1] Sharp practices refer to conduct that, while not necessarily unlawful, is deliberately misleading, exploitative or unethical, and designed to circumvent the intent of rules, safeguards or oversight mechanisms for improper advantage.

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spectrum ranging from knowing collusion to coercion, and the ACIC assesses that some participants are likely unaware they are involved in fraudulent activity. In coercive cases, intimidation and threats of physical violence have been used to compel compliance, particularly against participants with physical or cognitive impairments.

Professional facilitation is a recurring feature of these exploitation models. In some cases, allied health professionals and other trusted intermediaries assist unsuitable providers to gain entry to the NDIS, pass audits or inflate participant funding, embedding sharp practices within otherwise legitimate professional and service delivery environments. This facilitation can include the preparation of false or exaggerated documentation to support access or higher funding, and materially increases the capacity of organised fraud actors to generate and sustain non-compliant activity within the Scheme.

While the precise quantum of fraud within the NDIS cannot be reliably quantified, information suggests that the extent of non-compliance is material and, in some cases, systemic. Analysis of providers subject to banning, suspension or serious regulatory action shows that a significant proportion exhibited historical risk indicators prior to entering the Scheme, including prior fraud convictions, adverse findings in other government programs, suspicious financial activity and poor engagement with the taxation system. In many cases, these indicators were identifiable before entry to the NDIS, suggesting missed opportunities for earlier intervention.

Impacts on participants and families

Non-compliance within the NDIS has direct and tangible impacts on participants and their families. Weaknesses in provider suitability and screening can allow unsuitable or criminally-linked providers to operate within the Scheme, increasing the risk that participants are exposed to poor-quality care, exploitation, or services that are not delivered as intended. Where oversight is limited and funding can be accessed without meaningful scrutiny, these risks are heightened, particularly for participants who rely heavily on providers to manage or deliver their supports.

Fraudulent and non-compliant conduct also diverts Scheme funding away from legitimate supports, undermining participants' safety, wellbeing and independence. In some cases, participants may be drawn into collusive arrangements – knowingly or unknowingly – exposing them to financial, legal and personal harm. s 47C [redacted]

These harms are compounded where organised exploitation models rely on coercion. ACIC analysis indicates that participants from non-English speaking backgrounds, those with limited support networks, and those with significant physical or cognitive impairments may be particularly vulnerable. In coercive cases, intimidation or threats of violence can be used to compel compliance, undermining participants' ability to engage independently with the National Disability Insurance Agency (NDIA) and increasing the risk of ongoing harm. Over time, such exploitation damages confidence in the Scheme and creates uncertainty and distress for participants and families seeking safe and reliable support.

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s 47C [redacted]

Over time, a range of policy, regulatory and operational measures have been implemented to strengthen NDIS integrity, including enhanced compliance activity and increased inter-agency cooperation. The ACIC contributes to these efforts as a member of the Fraud Fusion Taskforce (FFT) and host of the Fraud Fusion Centre, which includes seconded members from various FFT agencies. The ACIC is working alongside partner agencies to integrate intelligence and regulatory information and target serious and organised fraud affecting the NDIS. These measures have improved the detection and disruption of fraud, particularly among registered providers and cohorts identified as higher risk.

ACIC analysis indicates that elements of the broader NDIS integrity framework face challenges in keeping pace with an evolving threat environment. In particular, structural features such as reliance on self-declaration and limited visibility of emerging risk during application processes can be exploited by SOC actors. Where adverse intelligence holdings or concerning patterns of behaviour are relevant to suitability assessments, these constraints may limit the effectiveness of timely intervention.

Similar challenges arise in relation to unregistered providers. Unregistered providers can lawfully deliver services to self-managed and plan-managed participants while operating outside many of the suitability, registration and ongoing compliance requirements that apply to registered providers. Given the scale of participant access to this cohort, ACIC analysis suggests this represents a material and not yet fully understood exposure for the Scheme. Reporting indicates that unregistered provider arrangements are frequently used by higher-risk actors to reduce scrutiny while maintaining access to NDIS funding.

Fraud risks in the NDIS are also evident in a broader, whole-of-government context. ACIC analysis identifies repeat and cross-program offending, where individuals and networks previously subject to compliance or enforcement action in other Commonwealth programs subsequently re-emerge in the NDIS. This pattern highlights the challenges posed by fragmented information-sharing arrangements and the absence of a consolidated, cross-program view of provider risk and suitability frameworks.

s 47C [redacted]

[redacted]

Risks are most pronounced in parts of the Scheme where providers operate with limited checks or oversight, increasing exposure to repeat or organised non-compliance. In such contexts, approaches that improve visibility and monitoring – particularly where funding levels are high or delivery arrangements reduce transparency – may assist in reducing exploitation of the Scheme. More

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consistent consideration of relevant compliance, enforcement and historical risk information across government could further support earlier detection and prevention of these risks.

Maintaining integrity settings that are responsive to changing threats, informed by intelligence and proportionate to risk supports participant protection, public confidence and the long-term sustainability of the NDIS. As Australia's national criminal intelligence agency, the ACIC will continue to support these efforts by integrating intelligence, financial, regulatory and law-enforcement information to inform a shared, whole-of-government understanding of emerging risks.

CONCLUSION

Non-compliance within the NDIS reflects the characteristics of a SOC threat environment, in which criminal actors actively seek to exploit large, complex and well-funded public programs for profit. s 47C [redacted]

Addressing these risks requires a sustained, intelligence-informed and coordinated approach across government. Effective protection of the NDIS depends on the ability to identify emerging patterns of exploitation, share relevant risk information across programs and jurisdictions, and intervene earlier to prevent harm to participants and misuse of public funds. As Australia's national criminal intelligence agency, the ACIC will continue to support these efforts by providing integrated intelligence and analysis to inform policy, regulatory and operational responses, and to safeguard the long-term integrity of the Scheme and the safety of those who rely on it.

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Document 12

AUSTRALIAN CRIMINAL INTELLIGENCE COMMISSION

SUBMISSION

Joint Standing Committee on the National Disability Insurance Scheme (NDIS) Inquiry into the Integrity of the NDIS

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INTRODUCTION

The Australian Criminal Intelligence Commission (ACIC) welcomes the opportunity to provide a submission to the Joint Standing Committee on the National Disability Insurance Scheme (NDIS) Inquiry into the Integrity of the NDIS.

The ACIC is Australia's national criminal intelligence agency with an exclusive legislated mandate to combat serious and organised crime (SOC). The ACIC plays a central role in protecting Australia from criminal exploitation by providing high-quality criminal intelligence that informs operational decision-making, shapes policy and regulatory settings, and supports coordinated national responses across jurisdictions and sectors.

In fulfilling this role, the ACIC:

- provides unique, actionable and insightful criminal intelligence to partners and advice to government on SOC – including where it has a transnational dimension – through the collection and analysis of information and data on complex offending patterns, criminal business models, and criminal groups, networks and individuals across multiple crime vectors
- undertakes investigations and operations for purposes including identifying vulnerabilities in particular networks and systems, and collecting and disseminating intelligence – as well as evidence of SOC related offences – to facilitate enforcement, prevention, disruption and regulation activities
- provides national policing information systems and services to law enforcement and intelligence partners to keep them – and the Australian community – safe
- delivers background checking services to support employment or entitlement decisions and to maintain community safety.

OFFICIAL

THE EVOLVING SERIOUS AND ORGANISED CRIME ENVIRONMENT IMPACTING AUSTRALIA

Australia's SOC environment is becoming more complex, networked and damaging to the nation's economic, social and security interests. Contemporary SOC groups are highly opportunistic and increasingly diversified, targeting any activity where profit can be generated at scale, including the systematic exploitation of government-funded programs. This reflects a broader shift in the criminal landscape, with SOC increasingly converging with legitimate systems, services and supply chains, often supported by professional facilitators and corporate structures that obscure control and financial flows.

Today's SOC networks operate as decentralised, digitally enabled enterprises, frequently spanning multiple jurisdictions. Senior criminal figures may reside offshore while directing activity remotely through encrypted communications, digital platforms and trusted intermediaries. These networks rely on complex business structures and sophisticated financial arrangements to move and conceal proceeds, enabling them to adapt quickly to regulatory change and exploit vulnerabilities across both physical and digital environments. Technology has become a key enabler, allowing criminal groups to scale operations, reduce exposure and maintain resilience.

The scale of harm associated with this threat has grown significantly. The Australian Institute of Criminology estimates the cost of SOC to Australia reached up to $82.3 billion in 2023-24, equivalent to 3.2 per cent of GDP. Beyond direct economic losses, SOC activity undermines community safety, erodes trust in institutions, distorts legitimate markets and places sustained pressure on government services. As criminal enterprises increasingly embed themselves within lawful economic activity, they amplify systemic vulnerabilities and challenge traditional intelligence, regulatory and enforcement approaches.

In this environment, government-funded programs involving large public expenditure, complex delivery arrangements and vulnerable cohorts are particularly attractive targets. ~~The NDIS sits squarely within this risk profile.~~ SOC actors actively seek opportunities where oversight can be circumvented, intermediaries leveraged and criminal activity disguised as legitimate service provision. Understanding this broader SOC context is critical to assessing non-compliance in the NDIS – fraud and 'sharp practices'[1] are not occurring in isolation, but as part of a wider criminal ecosystem that targets public funds and exploits structural weaknesses for profit.

Accordingly, addressing integrity risks in the NDIS requires an understanding of the contemporary SOC threat – one characterised by adaptability, convergence with legitimate systems and exploitation at scale. An intelligence-led approach that identifies emerging patterns, hidden

[1] Sharp practices refer to conduct that, while not necessarily unlawful, is deliberately misleading, exploitative or unethical, and designed to circumvent the intent of rules, safeguards or oversight mechanisms for improper advantage.

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networks and cross-sector linkages is essential to supporting effective disruption, policy hardening and the long-term protection of the NDIS and its participants.

INTEGRITY OF THE NATIONAL DISABILITY INSURANCE SCHEME

ACIC ~~analysis~~ intelligence indicates that non-compliance within the NDIS extends beyond isolated or opportunistic misuse and includes deliberate fraud, sharp practices and organised exploitation consistent with broader SOC methodologies. These behaviours have persisted over time and, in some cases, become increasingly sophisticated~~, reflecting both the scale of NDIS funding and structural vulnerabilities within the Scheme~~. Understanding the nature, extent and impacts of this SOC exploitation and non-compliance is critical to safeguarding participants, maintaining public confidence and protecting the long-term integrity of the NDIS.

s 47C [redacted]

Nature and extent of SOC exploitation and non-compliance, including fraud and sharp practices

~~ACIC analysis indicates that n~~Non-compliance within the NDIS occurs across a continuum, ranging from sharp practices at the margins of compliance to serious and organised fraud. ~~Intelligence and regulatory analysis shows that f~~Fraudulent conduct commonly includes false or inflated claims for supports that are not delivered, claims submitted while participants are hospitalised or incarcerated, and claims made against expired plans. In more serious cases, collusive arrangements have been identified between providers and participants, nominees or family members, including the provision of cash or other inducements to facilitate fraudulent access to the ~~Scheme~~ NDIS or ongoing misuse of participant plans.

The misuse of NDIS funds is a recurring feature of serious non-compliance. This includes large cash withdrawals, asset purchases and financial transactions that are inconsistent with the delivery of disability supports and indicative of efforts to obscure the origin or use of ~~Scheme~~NDIS funds. Such conduct diverts funding away from intended supports, undermines the integrity ~~of the Scheme~~ of, and erodes public confidence in, the NDIS.

Of particular concern is the involvement of SOC actors in exploiting the NDIS. The ACIC assesses that a range of criminal entities – including traditional organised crime groups, professional fraud syndicates and scheme-hopping networks – have established or infiltrated NDIS providers. These actors exploit the ~~Scheme~~NDIS to generate income, launder illicit proceeds and conceal asset ownership, often using criminal business models observed across other Commonwealth payment and regulatory programs. This indicates that NDIS exploitation frequently forms part of broader, repeat offending rather than isolated misconduct. The money fraudulently obtained by SOC through exploitation of the NDIS is also routinely recycled into a range of other serious criminal activity.

A central enabling methodology ~~identified in ACIC analysis~~ is the use of cash incentives, or "kickbacks", to participants, nominees or family members. These arrangements operate along a spectrum ranging from knowing collusion to coercion, and the ACIC assesses that some participants are likely unaware they are involved in fraudulent activity. In coercive cases, intimidation and threats

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of physical violence have been used to compel compliance, particularly against participants with physical or cognitive impairments.

Professional facilitation is a recurring feature of these exploitation models. In some cases, allied health professionals and other trusted intermediaries assist unsuitable providers to gain entry to the NDIS, pass audits or inflate participant funding, embedding sharp practices within otherwise legitimate professional and service delivery environments. This facilitation can include the preparation of false or exaggerated documentation to support access or higher funding, and materially increases the capacity of organised fraud actors to generate and sustain non-compliant activity within the NDISScheme.

While the precise quantum of fraud within the NDIS is difficult to accurately quantify, information suggests that the extent of non-compliance is significant and, in some cases, systemic. Analysis of providers subject to banning, suspension or serious regulatory action shows that a significant proportion exhibited historical risk indicators prior to entering the SchemeNDIS, including prior fraud convictions, adverse findings in other government programs, suspicious financial activity and poor engagement with the taxation system. In many cases, these indicators were identifiable before entry to the NDIS, suggesting missed opportunities for earlier intervention.

Impacts on participants and families

Non-compliance within the NDIS has direct and tangible impacts on participants and their families. Weaknesses in provider suitability and screening can allow unsuitable or criminally-linked providers to operate within the NDISScheme, increasing the risk that participants are exposed to poor-quality care, exploitation, or services that are not delivered as intended. Where oversight is limited and funding can be accessed without meaningful scrutiny, these risks are heightened, particularly for participants who rely heavily on providers to manage or deliver their supports.

Fraudulent and non-compliant conduct also diverts Scheme funding away from legitimate supports, undermining participants' safety, wellbeing and independence. In some cases, participants may be drawn into collusive arrangements – knowingly or unknowingly – exposing them to financial, legal and personal harm. s 47C [redacted]

These harms are compounded where organised exploitation models rely on coercion. ACIC analysis indicates that pParticipants from non-English speaking backgrounds, those with limited support networks, and those with significant physical or cognitive impairments may be particularly vulnerable. In coercive cases, intimidation or threats of violence can be used to compel compliance, undermining participants' ability to engage independently with the National Disability Insurance Agency (NDIA) and increasing the risk of ongoing harm. Over time, such exploitation damages confidence in the Scheme and creates uncertainty and distress for participants and families seeking safe and reliable support.

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s 47C Collaboration between agencies to strengthen NDIS integrity

s 47C

Over time, a range of policy, regulatory and operational measures have been implemented to strengthen NDIS integrity, including enhanced compliance activity and increased inter-agency cooperation. The ACIC contributes to these efforts as a member of the Fraud Fusion Taskforce (FFT) and host of the Fraud Fusion Centre, which includes seconded members from various FFT agencies. The ACIC is working alongside partner agencies to integrate intelligence and regulatory information and target serious and organised fraud affecting the NDIS. These measures have improved the detection and disruption of fraud, particularly among registered providers and cohorts identified as higher risk.

ACIC intelligence ~~analysis~~ indicates that SOC actors continue to target perceived vulnerabilities within the broader NDIS integrity framework. In particular, structural features such as reliance on self-declaration and limited visibility of emerging risk during application processes can be exploited by SOC actors. Inability to effectively leverage adverse intelligence holdings or concerning patterns of behaviour, or verify self-disclosed information within suitability assessments may limit the effectiveness of timely intervention.

Similar challenges arise in relation to unregistered providers. Unregistered providers can lawfully deliver services to self-managed and plan-managed participants while operating outside many of the suitability, registration and ongoing compliance requirements that apply to registered providers. Given the scale of participant access to this cohort, ~~ACIC analysis suggests~~ unregistered providers may pose a real but not yet fully understood fraud risk ~~for the Scheme~~. Reporting indicates that unregistered provider arrangements are frequently used by higher-risk actors to reduce scrutiny while maintaining access to NDIS funding.

Fraud risks in the NDIS are also evident in a broader, whole-of-government context. ACIC ~~analysis~~ intelligence identifies repeat and cross-program offending, where individuals and networks previously subject to compliance or enforcement action in other Commonwealth programs subsequently re-emerge in the NDIS. This pattern highlights the challenges posed by fragmented information-sharing arrangements and the absence of a consolidated, cross-program view of provider risk and suitability frameworks.

s 47C

s 47C

[redacted]

Risks are most pronounced in parts of the ~~Scheme~~ NDIS where providers operate with limited checks or oversight, increasing exposure to repeat or organised non-compliance. In such contexts,

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approaches that improve visibility and monitoring – particularly where funding levels are high or delivery arrangements reduce transparency – may assist in reducing exploitation ~~of the Scheme~~. More consistent consideration of relevant compliance, enforcement and historical risk information ~~across government~~ could further support earlier detection and prevention of these risks.

Continuing collaboration between agencies will enable opportunities to strengthen how the NDIS prevents exploitation, protects participants and reduces the risk of SOC involvement.

CONCLUSION

Non-compliance within the NDIS reflects the characteristics of a SOC threat environment in which criminal actors actively seek to exploit large, complex and well-funded public programs for profit. s 47C [redacted].

Addressing these risks requires a sustained, intelligence-informed and coordinated approach across government. Effective protection of the NDIS depends on the ability to identify emerging patterns of exploitation, share relevant risk information across programs and jurisdictions, and intervene earlier to prevent harm to participants and misuse of public funds. Maintaining integrity settings that are intelligence-informed, risk-proportionate and responsive to changing threats is essential to protecting participants, maintaining public confidence and the long-term sustainability of the NDIS.

As Australia's national criminal intelligence agency, the ACIC will continue to support these efforts by providing ~~integrated~~ intelligence ~~and analysis~~on Australia's SOC threat environment to inform policy, regulatory and operational responses~~, and to safeguard the long-term integrity of the Scheme and the safety of those who rely on it.~~

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