

**26 March 2026**

NDIS Evidence Advisory Committee

Department of Health, Disability and Ageing

Via email: [disabilityevidence@health.gov.au](mailto:disabilityevidence@health.gov.au)

Dear Evidence Advisory Committee Secretariat,

### **NDIS EAC Consultation - Third Round**

People with Disability Australia (PWDA) welcomes the opportunity to contribute to the NDIS Evidence Advisory Committee's (EAC) third consultation on supports under review, assessing:

- early intensive behavioural interventions
- positive behaviour support for older children and adults
- robot-assisted gait training
- social skills training as a disability support for children and young people

This submission addresses Early Intensive Behavioural Interventions (EIBI) and Positive Behaviour Support (PBS) for older children and adults.

PWDA acknowledges that other peak bodies and specialist organisations are better placed to comment on robot-assisted gait training and social skills training; therefore, our submission focuses on areas most relevant to our expertise and lived experience insights.

PWDA maintains that all NDIS evidence assessments must incorporate the lived experience of people with disability and we urge the EAC to consider lived experience expertise when deciding what constitutes 'evidence' of the effectiveness, cost, safety and quality of supports.

As stated in PWDA's previous submission to the EAC, research and data collection should be co-produced with people with disability and their representative organisations as active partners.

Qualitative feedback from people with disability and families and carers of people with disability should be highly sought and regarded when evaluating the value and benefits of funding supports, as outlined in PWDA's [NDIS Supports Rule Submission](#).

### **Early intensive behavioural intervention (EIBI)**

Current evidence supports the effectiveness of EIBI when commenced at the earliest feasible age in childhood. Research indicates that early interventions can improve developmental outcomes across multiple domains, including communication, adaptive functioning, social skills, and emotional regulation.<sup>1</sup>

Economic modelling further reinforces the importance of EIBI, with estimates indicating that every dollar invested in early intervention can save up to six dollars in long-term support costs.<sup>2</sup> These savings stem from improved functional abilities, increased independence, and reduced need for lifelong support services.

PWDA supports autism organisations that emphasise that effective early intervention must adopt a strengths-based, person-centred philosophy.<sup>3</sup>

Interventions must also support communication, sensory regulation, emotional wellbeing, and the development of autonomy, not compliance-based behavioural modification.

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<sup>1</sup> (Eikeseth et al. 2012, MacDonald et al., 2014). *A Treatment Summary of Early Intensive Behavioral Intervention*. Association for Science in Autism Treatment. <https://asatonline.org/for-parents/learn-more-about-specific-treatments/early-intensive-behavioral-intervention-treatment-2/>

<sup>2</sup> Robson, S. (2025). *NDIS overhaul must allow kids with most profound autism to retain supports*. Autism Aspergers Advocacy Australia. <https://a4.org.au/node/2756>

<sup>3</sup> Autism Awareness Australia. *What is early intervention?* <https://www.autismawareness.com.au/navigating-autism/what-is-early-intervention-for-autism>

## Positive behaviour support (PBS) for older children and adults

PWDA has consistently advocated for the full elimination of restrictive practices, which we view as a form of legalised institutional violence that is applied in a disproportionate and discriminatory way against people with disability.<sup>4</sup>

Behaviour that is labelled as “challenging” is often a legitimate expression of distress, unmet needs, trauma, or inaccessible environments. Instead of focusing on controlling behaviour, PWDA asserts that PBS must support communication, safety, autonomy, and meaningful participation.<sup>5</sup>

A 2025 review of restrictive practices emphasised that restraint and seclusion have no place in rights-based education, reinforcing concerns about the physical and psychological risks associated with restrictive interventions.<sup>6</sup>

Further, a Department for Education (UK) 2024 review highlighted widespread concerns about the use of force and emphasises the need for prevention and de-escalation approaches — core components of PBS — to minimise harm.<sup>7</sup>

PBS is consistent with the UN Convention on the Rights of Persons with Disabilities, focusing on autonomy, dignity, and participation. Restrictive practices often violate these rights and have been identified by inquiries — including the Australian Disability Royal Commission — as contributing to violence, abuse and neglect.

Across disability, education, and mental health sectors, evidence shows that:

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<sup>4</sup> People with Disability Australia. Review of a Legislative Framework to Regulate Restrictive Practices. <https://pwd.org.au/review-of-a-legislative-framework-to-regulate-restrictive-practices/>

<sup>5</sup> People with Disability Australia. *Review of a Legislative Framework to Regulate Restrictive Practices*. <https://pwd.org.au/review-of-a-legislative-framework-to-regulate-restrictive-practices/>

<sup>6</sup> Hall, A., & Chan, J. (2025): From miscuing to misuse: why restraint and seclusion have no place in rights-based education, *Psychiatry, Psychology and Law*, <https://doi.org/10.1080/13218719.2025.2568957>

<sup>7</sup> Department of Education UK (2024). [Reasonable force, restraint & restrictive practices in alternative provision and special schools](#)

- PBS is more effective than restrictive practices in reducing behaviours of concern.
- PBS enhances quality of life, environmental supports, relationships and skill development.
- Restrictive practices carry significant harm, lack evidence of long-term effectiveness, and undermine human rights.
- Policy direction is shifting, nationally and internationally, toward minimising restrictive practices and promoting PBS.

PBS is therefore the recommended framework for organisations committed to safety, evidence-based practice and human-rights–driven service delivery.

However, recent research emphasises that authentic PBS must be individualised, evidence-based, and explicitly grounded in human rights principles, not merely a set of behaviour management strategies.<sup>8</sup>

A 2024 practice framework developed by Fisher et al. shows that high-quality PBS requires:

- genuine understanding of a person's needs and context
- a commitment to the person's human rights
- systematic, evidence-driven interventions
- meaningful collaboration with the person, their supporters, and their community.<sup>9</sup>

Researchers developed the framework after determining that many providers use the term “PBS” despite delivering practices that are not rights-affirming, not person-centred, or not evidence-based, highlighting widespread implementation problems.

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<sup>8</sup> Fisher, A. et al. (2024): *A positive behaviour support practice framework for disability and community services in Australia that prioritises human rights and evidence-based practices*, Disability and Rehabilitation, DOI: 10.1080/09638288.2024.2402079 To link to this article: <https://doi.org/10.1080/09638288.2024.2402079>

<sup>9</sup> Ibid

The NDIS Quality and Safeguards Commission explicitly states that PBS is a rights-based and values-driven approach focusing on understanding the reasons behind behaviours and improving quality of life.<sup>10</sup>

PWDA asserts that a robust PBS framework must:

- reduce and eliminate restrictive practices
- prioritise functional communication and emotional regulation
- involve co-design with participants and supporters
- ensure practitioners are adequately trained and
- be trauma-informed and rights-based.

## **PWDA Recommendations**

**Recommendation 1** - Evidence reviews must centre on the lived experience of people with disability and incorporate co-designed methodologies.

**Recommendation 2** - NDIS should maintain and expand investment in EIBI where it demonstrably enhances communication, autonomy, and long-term wellbeing.

**Recommendation 3** - Embed trauma-informed, rights-based approaches in all behaviour support frameworks.

**Recommendation 4** - Commit to eliminating restrictive practices entirely in favour of evidence-based, person-centred supports.

PWDA strongly supports continued NDIS funding for effective early intervention and behaviour support programs that enhance independence, wellbeing, and inclusion. These supports must uphold human rights, prioritise participant agency, and contribute to long-term positive outcomes. PWDA welcomes further engagement with the EAC and is available for consultation.

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<sup>10</sup> NDIS Quality and Safeguards Commission. *Behaviour Support and restrictive Practices*.  
<https://www.ndiscommission.gov.au/rules-and-standards/behaviour-support-and-restrictive-practices>

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Megan Spindler-Smith', with a large, stylized flourish at the end.

**Megan Spindler-Smith**  
**Acting Chief Executive Officer**  
**People with Disability Australia**