



National Disability Insurance Agency Fraud and Corruption Control Plan

March 2026

Contents

1. Introduction	4
1.1 Commonwealth Fraud and Corruption Control Framework	5
1.2 NDIA Fraud and Corruption Control System.....	5
1.3 Definitions.....	7
2. Fraud and corruption risks assessments and control plans	10
3. Agency mechanisms for Fraud and Corruption Control	12
4. Governance	12
5. Roles and Responsibilities	14
6. Fraud and Corruption Reporting Channels	17
7. References	18



Acknowledgement of Country

The NDIA acknowledges the Traditional Custodians of Country throughout Australia and their continuing connection to land, sea and community. We pay our respects to them and their cultures, and to Elders past, present and emerging.

1. Introduction

The Fraud and Corruption Control Plan (**FCCP**) outlines the National Disability Insurance Agency's (**NDIA** or **Agency**) approach to managing fraud and corruption risks for the Agency and the National Disability Insurance Scheme (**NDIS** or **Scheme**). The FCCP contains a fraud and corruption risk assessment and plans that support the Agency to achieve its purposes and objectives as outlined in the [NDIA Corporate Plan](#).

The FCCP has been prepared for section 10 of the [Public Governance, Performance and Accountability Rule 2014](#) (PGPA Rule) and explains how the Agency controls fraud and corruption.

The NDIA Board is the accountable authority of the NDIA which manages and delivers the NDIS (*Public Governance, Performance and Accountability Act, 2013:S12*). The Board provides an annual risk appetite statement for Integrity Risks which includes fraud and corruption risk. The Board has Conservative (low) appetite for fraud and corruption and takes deliberate measures to prevent, detect and respond to fraud and corruption risks. The Board has instructed the Agency and its officials to make all reasonable efforts to protect the Agency, the Scheme and our participants from fraud and corruption.

As outlined in the Auditor-General's Report tabled in June 2025, the NDIA was established with "catastrophically weak" prevention controls, systems and legislative architecture, and is continuing to build new systems and implement legislative reform to strengthen the NDIS. The Agency has been on a significant maturity journey, and this work remains critical to improving integrity, transparency and control effectiveness across payments, providers and participant interactions.

To support this activity, the NDIA continues to integrate integrity principles into its processes and risk assessments and embed preventative controls across the Scheme, improving compliance with the Commonwealth Fraud and Corruption Control Framework, with an initial emphasis on meeting binding obligations under

the section 10 of the PGPA Rule, and undertaking structured maturity assessment based on the Commonwealth Farud and Prevention Centre criteria.

1.1 Commonwealth Fraud and Corruption Control Framework

The Commonwealth Fraud and Corruption Control Framework 2024 is designed to support Australian Government entities to the effectively manage risks of fraud and corruption and consists of 3 parts:

1. **Section 10 of the PGPA Rule 2014.** The Fraud and Corruption Rule is a legislative instrument binding for all Public Governance, Performance and Accountability (**PGPA**) Act entities. It sets out the minimum standards for accountable authorities of PGPA Act entities in relation to managing the risk and incidents of fraud and corruption relating to their entity.
2. **The Commonwealth Fraud and Corruption Policy.** The Fraud and Corruption Policy sets out procedural requirements entities must implement in relation to specific areas of fraud and corruption control such as investigations and reporting. The NDIA Board has decided to adopt the Commonwealth Fraud and Corruption Policy as best practice.
3. **Resource Management Guide (RMG) 201: Preventing, detecting and dealing with fraud and corruption** – The Resource Management Guide 201 provides further practical guidance on the fraud and corruption control arrangements for all Commonwealth entities. The NDIA Board has decided to adopt the guidance as best practice.

1.2 NDIA Fraud and Corruption Control System

The Agency's Fraud and Corruption Control System details how Agency activities meet the requirements of the Commonwealth Fraud and Corruption Control Framework.

National Disability Insurance Scheme Act 2013. Details the functions of the NDIA as a Corporate Commonwealth Entity and establishes the Board as the Accountable

Authority. The NDIA is responsible for preventing, detecting, investigating and responding to misuse or abuse of, or criminal activity involving, the NDIS amounts, funding of supports, and participant information.

NDIA Corporate Plan. The Corporate Plan is endorsed by the Board and sets out the objectives and strategies to achieve the purposes of the NDIA (including its functions).

NDIA Accountable Authority Instructions. Section 1 of the instructions details the duties and responsibilities of officials to comply with the finance law, which includes the PGPA Act, the PGPA Rule, any other instruments made under the PGPA Act (including these instructions), and an Appropriation Act. The instructions are applicable to officials of the Agency and officials of other entities that use or manage public resources for which the Board of the Agency is responsible. Section 2 instructs:

- all officials to act in accordance with the Agency's risk management framework to ensure that risk management practices are aligned to the Agency's risk appetite and tolerance for risk, and consistent with the Agency's methodology to assess and treat risks.
- all officials must act in accordance with the Agency's Fraud and Corruption Control Plan.

NDIA Risk Management Framework. The NDIA Risk Management Framework comprises key policy documents and is supported by a range of risk management guidance materials to help officials to identify, manage and report risks.

NDIA Fraud and Corruption Control Plan. The FCCP assists the Agency to document and communicate how the NDIA and the Board align to and satisfies the obligations under the Commonwealth Fraud and Corruption Framework, and how it will manage and monitor current or planned activities to manage and assess fraud and corruption risks.

NDIA Compliance and Enforcement Framework. The Compliance and Enforcement Framework details how the NDIA implements its approach for

prevention, detection, investigation, response, monitoring and reporting of fraud and corruption.

Fraud Fusion Taskforce. The Fraud Fusion Taskforce, jointly led by the NDIA and Services Australia, was established in November 2022 to strengthen the Commonwealth's coordinated response to fraud affecting the NDIS. The Taskforce brings together intelligence, compliance and enforcement capabilities from across government to identify, disrupt and take action against individuals and businesses seeking to exploit the Scheme.

1.3 Definitions

- **Bribery** – Includes conduct covered by the Commonwealth Criminal Code Act 1995 sections 70.2, 141.1, and 142.1 (domestic and foreign bribery).
- **Control** – Individual measures, processes or functions that help entities prevent, detect and respond to fraud. An integrated assembly of controls make up a control environment.
- **Corruption** – Is any action that undermines the integrity or fairness of public administration. For example, a public official misusing their position or breaching public trust for unlawful gain, misuse of information obtained as a public official, or any actions that negatively affect the fairness of a public official's duties. Corruption also includes plans or attempts to engage in such activities.
- **Error** – An unintentional or negligent act or omission that causes a loss and does not constitute fraud or corruption.
- **Fraud** – Dishonestly obtaining (including attempting to obtain) a gain or benefit, or causing a loss or risk of loss, by deception or other means. The conduct does not need to represent a breach of criminal law. A benefit or loss is not restricted to a material benefit or loss and may be tangible or intangible. A third party may also obtain a benefit.
 - It can be committed internally by Agency Staff (Including labour hire and contractors), or externally by providers, participants, members of the public including, third part organisations and by people online

nationally or internationally. Fraud includes theft, falsifying documents, or misusing information for personal gain. Fraud requires intent, not carelessness or mistake, and if intent cannot be proven the act may be classified as non-compliance instead of fraud.

- Offences of fraud against the Commonwealth may be prosecuted under several Commonwealth laws, including the Criminal Code Act 1995 or the Crimes Act 1914.
- **Internal fraud** – Occurs when employees, labour hire or contractors within the agency:
 - misuse staff entitlements (such as medical leave, travel or overtime)
 - access or disclose sensitive or proprietary information (such as customer or official information) without authority
 - inappropriate use or theft of agency assets (such as IT equipment, mobile phones or fleet vehicles) for personal benefit
 - use system access to create fraudulent payments or redirect payments
 - manipulate procurement or recruitment processes
 - use their inside knowledge to make false claims for payments as customers of the agency.
- **External fraud** – Occurs when customers or other third parties:
 - deliberately provide false or misleading information to make a claim for a payment or service
 - assume, or attempt, to assume another person's identity to gain a benefit or advantage
 - redirect another person's payment, where there is no legal basis for doing so
 - provide false evidence for services or goods not provided
 - access Agency information and systems without authority.
- **Identity fraud** - The gaining of money, goods, services or other benefits, or the avoidance of obligations through the use of fabricated, manipulated, stolen or otherwise fraudulently assumed identity.
- **Non-compliance** – Any failure to meet legal, regulatory, or contractual obligations, either intentionally or unintentionally. The Agency employs a risk-based approach to address non-compliance and focuses on assisting individuals to comply by offering support, education, and utilising higher intensity

interventions for those who deliberately choose not to comply.

- **Risk** – The effect of uncertainty on objectives. An effect is a deviation from the expected positive and/or negative. Risk is often expressed in terms of a combination of the consequences of an event and the associated likelihood of occurrence.
- **Risk treatment** – Action taken after it has been agreed that controls in place are deemed ineffective and additional mitigation activities are required.
- **Risk Appetite Statement** – Describes the overarching amount and types of risk the NDIA Board is willing to accept to achieve its objectives. It is supported by risk tolerance statements that operationalise the risk appetite by specifying the levels of risk taking that are acceptable.
- **Risk Appetite** – The overarching amount and types of risk the NDIA is willing to accept or retain in order to achieve its objectives.
- **Risk Tolerance** – The levels of risk-taking that are acceptable to achieve a specific strategic objective or manage a category of risk. Risk tolerance represents the practical application of risk appetite and will be most effective when it is easily understood by all officials.
- **Scam** – A dishonest scheme, which is a type of fraud – usually with the goal of trying to get money illegally from people.
- **Unethical behaviour** - The APS Values and Code of Conduct describe a work ethic expected of the public service that includes honesty, diligence, avoidance of conflict of interest, and proper use of resources. Breaches of the Code may constitute unethical behaviour. This includes systemic and organised criminal targeting the Agency with these actions.

2. Fraud and corruption risks assessments and control plans

The Agency has grouped fraud and corruption risks into 2 themes: Financial Misappropriation and Sensitive and Proprietary Information. The themes are aligned with the Agency’s Strategic Risks (*NDIA Corporate Plan 2025–26, 2025*) on ‘Integrity’ and ‘Safeguarding our information’ and are prevalent across 3 distinct actor types: External parties, Scheme stakeholders, and Trusted Insiders.

Table 1 depicts a mutually exclusive and collectively exhaustive structure with full risk landscape across the Agency’s strategic risks, themes, and actor types:

Table 1

Strategic risk	Fraud and compliance risk theme	External parties	Scheme stakeholders	Trusted insiders
Integrity	Financial misappropriation	Infiltration of NDIA systems or processes for financial gain	Manipulation of documentation or claims to access Scheme funds or inflate payments.	Inappropriate allocation or use of participant funding or Agency resources.
Safeguarding Information	Sensitive and Proprietary Information	Unauthorised access to or disclosure of confidential or commercially	Inappropriate access to or use of participant records.	Theft, manipulation, or disclosure of sensitive or

		sensitive information.		proprietary information.
--	--	------------------------	--	--------------------------

Fraud and corruption risks are to be managed through regular reviews and assessments in accordance with the Agency’s risk management framework. All details, including controls and treatment actions associated with fraud and corruption risks, are captured and maintained in Insight (the Agency’s central risk management system).

The Agency conducts targeted risk assessments for activities, policies, programs, or initiatives at high risk of fraud or corruption. These assessments ensure risks are identified and mitigated during design, implementation, or review stages.

The Agency consults and collaborates with other entities when fraud or corruption risks intersect across entities.

Emerging fraud and corruption risks are identified through regular fraud risk reviews, fraud risk assessments, fraud risk surveys, and monitoring developments within the Australian Public Service and global trends. Based on these insights, appropriate mitigation strategies are developed and implemented.

3. Agency mechanisms for Fraud and Corruption Control

The Agency has categorised mechanism for fraud and corruption control under prevention; detection; investigation and response; and the monitoring and reporting of fraud and corruption. These mechanisms are detailed in the [NDIA Compliance and Enforcement Framework](#).

4. Governance

The NDIA's governance model supports fraud and corruption control through a structured Three Lines of Defence approach (Table 2), ensuring accountability and oversight at all levels, in addition to fostering an anti-fraud and anti-corruption culture.

Line 1 – Operational Management: embeds integrity into day-to-day activities by implementing controls and monitoring compliance.

Line 2 – Risk and Compliance Oversight: provides independent challenge, frameworks, and control testing to ensure risks are effectively managed.

Line 3 – Independent Assurance: validates governance and control effectiveness through audits and reviews, giving confidence to the Board and stakeholders.

This model integrates with mechanisms detailed in the [NDIA Compliance and Enforcement Framework](#) for preventing, detecting, responding to, and monitoring fraud and corruption.

Committees such as the Executive Leadership Team Integrity Sub-Committee, Agency Audit and Risk Committee, and Board Audit and Risk Committee provide structured oversight and drive continuous improvement.

All officials in the NDIA, including contractors, have a shared responsibility to detect, report, and prevent fraud and corruption risks and behaviours. Table 2 details this 3 lines of defence model.

The NDIA monitors fraud and corruption related strategies through regular risk reporting mechanisms – i.e., reporting by the Chief Risk Officer and the Scheme Actuary, internal audits, and ANAO performance audits.

Table 2

Line of Defence	Role	Who	Responsibilities	Associated Committees
First Line: Operational Management	Own and manage fraud and corruption risks within business areas.	Branch Managers, SES, all employees and contractors.	Implement controls, monitor compliance, report suspected fraud, embed integrity practices in daily operations.	(No formal committee – operational responsibility lies with business units)
Second Line: Risk and Compliance Oversight	Provide specialist advice, frameworks, and monitoring to ensure effective fraud and corruption control.	Chief Risk Officer, Risk and Emergency Management Branch, Integrity Transformation and Fraud Fusion Taskforce Group.	Maintain Fraud and Corruption Control Framework, conduct risk assessments, monitor control effectiveness, report exposures to ELT and Board.	ELT Integrity Sub-Committee, Agency Audit and Risk Committee.

Third Line: Independent Assurance	Provide independent review and assurance over fraud and corruption control arrangements.	Internal Audit, Audit and Risk Committee, ANAO.	Test control effectiveness, review compliance with legislative requirements, recommend improvements.	Board Audit & Risk Committee
---	--	---	--	------------------------------

5. Roles and Responsibilities

NDIA Board

Responsibilities:

- Accountable Authority of the NDIA under the PGPA Rule 2014.
- Has a duty to establish and maintain systems of risk oversight and management and internal control (such as the Risk Management Strategy and Framework and the Fraud and Corruption Control Plan).
- Has a duty to take account of the risks associated with the use or management of public resources when imposing requirements on others in relation to the use or management of public resources.
- Must take all reasonable measures to prevent, detect and deal with fraud and corruption relating to the NDIA (PGPA Rule 2014 s10) and NDIS.
- Issue Accountable Authority Instructions for Agency Officials.
- Set the Agency's risk appetite on annual basis.
- Ensures the Agency's operating structure supports effective risk management per the NDIS Risk Management Rules 2013.
- Submits an annual Risk Management Declaration to the Ministerial Council.

Board Audit and Risk Committee

Responsibilities:

- The Committee reviews the Agency's system of risk oversight and management and provide advice to the Board on the appropriateness of the Agency's fraud and corruption control mechanisms and frameworks.
- Supports the Board to ensure the Agency has a sound risk management culture and the Agency's senior management take steps necessary to monitor and manage all material risks.
- Reviews fraud and corruption reports and assures associated risk management practices.
- Oversees internal and external audits, performance reporting, and regulatory compliance.

Executive Leadership Team Integrity Sub-Committee

Responsibilities:

- Provides structured oversight and drives continuous improvement for fraud and corruption controls and frameworks.

Agency Audit and Risk Committee

Responsibilities:

- Provides support to the Board and Executive Leadership Team in providing oversight and delivery of improvements to fraud and corruption controls and frameworks.

Chief Executive Officer (CEO)

Responsibilities:

- Ensures the NDIA has appropriate fraud and corruption prevention initiatives in place.

- Advises the Board and Ministers on sensitive fraud and corruption matters.
- Promotes a positive and ethical culture encouraging fraud and corruption reporting.

Scheme Actuary

Responsibilities:

- Engage in decisions made by the Agency and the Board in relation to risk.
- Report any significant concerns the Scheme Actuary has for risk management processes of the Agency to the Board as soon as reasonably practicable.

Chief Risk Officer (CRO)

Responsibilities:

- internal integrity risk related to fraud against the Scheme.
- Support functional fraud risk assessments.
- Manage the fraud and corruption control framework, Agency Fraud and Corruption Risk Register, and related mitigation strategies.

Senior Executive Staff (SES)

Responsibilities:

- Own and manage fraud and corruption risks within their remit (Group, Division or Branch).
- Promote a pro-integrity culture and environment aligned to the APS Code of Conduct.
- Develop and implement controls to mitigate fraud and corruption risks.
- Monitor fraud and corruption risk treatments and ensure assurance activities.
- Report and monitor emerging fraud and corruption risks.

All employees and contractors

Responsibilities:

- Act ethically, adhering to the APS Code of Conduct.
- Comply with the Accountable Authority instructions issued by the Board of the NDIA to act in accordance with the Agency's policies, procedures, and systems to prevent fraud and corruption.
- Report any suspected fraud or corruption incidents through approved channels.

6. Fraud and Corruption Reporting Channels

To foster transparency and accountability, the Agency provides various reporting channels for staff, contractors, participants, and the public to report suspected fraud or corruption. These include:

- **External Fraud:** reports about someone doing the wrong thing with NDIS funds can be made to the NDIS Fraud Reporting and Scams Helpline via web form ([NDIS website](#)), email (fraudreporting@ndis.gov.au), phone (1800 650 717), or the Agency's [Speak Up](#) portal (accessible to Agency staff only).
- **Scams and Identity fraud:** The NDIS Fraud Reporting and Scams Helpline supports those affected by fraud or identity theft, including scams. Information on types of scams and how to report a scam is held on the [NDIS website](#).
- **Public Interest Disclosure (PID):** Under the *Public Interest Disclosure Act 2013*, NDIA employees and contractors can confidentially report suspected wrongdoing, including fraud, corruption, or serious misconduct, in the public interest. Internal PIDs can be made by any of the following methods:
 - in person to their supervisor or one of the NDIA's authorised officers, including through a videoconference meeting such as Microsoft Teams.
 - by email to PID@ndis.gov.au (all emails to the PID inbox are treated as confidential)

- verbally by calling +61 2 6233 9200 and leaving a confidential voice message.
- **National Anti-Corruption Commission (NACC) Referral:** The Agency complies with mandatory referral obligations placed on Agency’s executives and Public Interest Disclosure officers under the *National Anti-Corruption Act 2022* to refer conduct that could be either serious or systemically corrupt in nature to the NACC. The NACC may investigate if it considers the matter could **involve** serious or systemic corrupt conduct. The Public Interest Disclosure framework provides legal protections against reprisal for individuals who make disclosures and ensures that reports are assessed and managed appropriately. The Agency has designated Public Interest Disclosure officers and established procedures to support staff in making disclosures safely and securely.
 - Agency staff may decide to report serious or systemic corruption to the NACC as a voluntary referral or refer matters to the Agency’s Chief Counsel Division.

7. References

- [National Disability Insurance Agency Corporate Plan 2025-26](#), 2025
- [Public Governance, Performance and Accountability Act](#), 2013