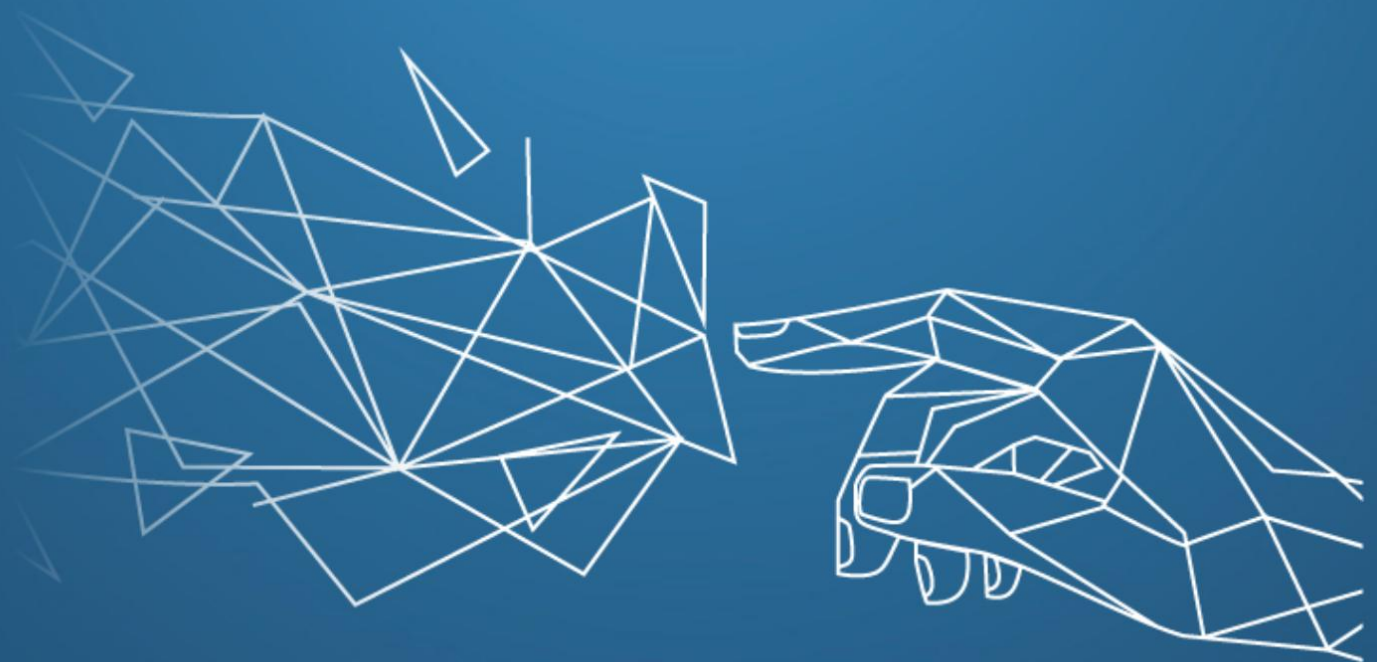




AI Governance Framework for Disability Service Providers



About

This framework is built on seven universally recognised pillars of "Good AI Practice" identified across international standards and validated through sector consultation with NDS members.

Methodology

To build this framework, NDS undertook a comprehensive desktop review of existing AI standards at a national, international, and sector level.

An exhaustive search was done using web search engines, generative AI, and a snowball approach (assessing the references cited in the documents found). Given the fast-paced nature of the recent technological advancements in the AI space, only materials from reputable sources developed within the last ten years were considered for inclusion in this review.

In the end, the following key guiding documents were included in this review:

International

- The UNESCO Recommendation on the Ethics of Artificial Intelligence
- G20 AI Principles
- OECD AI Principles

National

- Australia's AI Ethics Principles
- Australian Government AI Technical Standard
- National Framework for the assurance of AI in Government
- Australia's Voluntary AI Safety Standard
- APS AI Plan

Sector

- CSIRO's Framework for Artificial Intelligence-enabled Assistive Technology as Supports under the NDIS
- University of Queensland's Artificial Intelligence and Australian Charities White Paper

Once key sources were identified, a comparative analysis was undertaken. The contents of each document were analysed and grouped into themes. The themes of each document were then compared side-by-side to identify similarities, differences, and relationships between them.

This exercise revealed that seven core themes were present in all the included sources; which were adopted as the seven "universal" pillars for this framework. Themes that were present in some, but not all sources included:

- Primacy of charitable purpose
- NDIS alignment

- Dignity of risk considerations
- Duty of care considerations
- Accessibility considerations

These themes were present in the sector-specific sources consulted but not the international or national standards. Other themes that were present in some sources but not others included:

- Automation
- Augmentation
- Caution
- Innovation
- Efficiency
- Accuracy
- Reliability
- Literacy

To decide whether these themes should be included in NDS' AI Governance Framework, a roundtable with NDS members was held on 20 May 2026. The roundtable had 46 attendees who reviewed the principles and provided their feedback for their inclusion or lack thereof.

Participants approved of the universal principles and considered them appropriate and comprehensive enough for the sector. In addition to this, they considered all sector-specific principles should be included in the NDS AI Governance Framework, with NDIS alignment expanded to "regulatory alignment" to reflect State and Territory regulatory complexities as well as ongoing reforms. The other themes quoted in some sources but not others were deemed to be necessary for inclusion in operational guidelines rather than represent a principle in and of themselves. NDS is working on operational implementation guidelines to reflect this.

Based on this feedback, the NDS AI Governance Framework was then created.

At A Glance

AI Governance Framework
for the Disability Sector

Core Governance
Pillars



Accountability



Transparency
& Explainability



Fairness &
Bias Mitigation



Privacy &
Data Security



Human Centred
Design



Informed
Consent



Human
Oversight
& Control

Sector-Specific
Non-Negotiables



Primacy of
Charitable
Purpose



Accessibility



Regulatory
Alignment



Dignity of
Risk vs.
Duty of Care



Core Governance Pillars

Accountability

Humans must remain responsible for all decisions, regardless of AI involvement. Organisations cannot delegate or outsource liability to a system.

Transparency & Explainability

Impacted individuals have the right to know when they are interacting with an AI and to receive clear, simple explanations of how a system reached a specific outcome.

Fairness & Bias Mitigation

Active measures must be taken to prevent algorithmic bias that could result in discrimination against any individuals, communities or groups based on their demographics.

Human-Centred Design

Development processes must centre on the needs of people with disability through genuine co-design from the earliest stages of the AI lifecycle.

Informed Consent

Explicit, informed consent must be obtained from people before their data is used in AI systems, especially for sensitive activities like transcribing case notes.

Human Oversight & Control

A "human-in-the-loop" approach is required, ensuring humans can override, pause, or shut down a system if it produces incorrect or harmful outputs.

Privacy & Data Security

Systems must comply with the Privacy Act 1988 and Australian Privacy Principles, ensuring data sovereignty (storing data in Australia) and robust encryption.

Sector-Specific "Non-Negotiables"

In addition to the core principles, disability service providers must layer these specific requirements over general AI principles:

Primacy of Charitable Purpose

AI adoption must substantively advance the organisation's mission. Efficiency gains should never override public benefit or result in lower-quality, less personalised support.

Accessibility

AI tools and their outputs must be functionally accessible, adhering to Web Content Accessibility Guidelines (WCAG) and supporting assistive technologies.

Regulatory Alignment

All AI use cases must align with existing federal and state and territory regulatory requirements for disability service providers; including but not limited to the NDIS Code of Conduct and Practice Standards.

Balance Dignity of Risk and Duty of Care

AI policies must balance the provider's duty of care with a participant's dignity of risk, allowing them to make informed choices about using AI in their own lives.

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National Disability Services Limited
ABN 52 008 445 485