



**PEOPLE WITH DISABILITY
AUSTRALIA**

**A voice
of our
own**

**PWDA Response to the NDIS Quality and Safeguards
Commission Consultation Paper on Mandatory
Registration for Platform Providers.**

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About PWDA

People with Disability Australia (PWDA) is a national disability rights and advocacy organisation made up of, and led by, people with disability.

We have a vision of a socially just, accessible and inclusive community in which the contribution, potential and diversity of people with disability are not only recognised and respected but also celebrated.

PWDA was established in 1981, during the International Year of Disabled Persons.

We are a peak, non-profit, non-government organisation that represents the interests of people with all kinds of disability.

We also represent people with disability at the United Nations, particularly in relation to the United Nations Convention on the Rights of Persons with Disabilities (CRPD).

Our work is grounded in a human rights framework that recognises the CRPD and related mechanisms as fundamental tools for advancing the rights of people with disability.

PWDA is a member of Disabled People's Organisations Australia (DPO Australia), along with the First People's Disability Network, National Ethnic Disability Alliance and Women with Disabilities Australia.

DPOs collectively form a disability rights movement that places people with disability at the centre of decision-making in all aspects of our lives.

'Nothing About Us, Without Us' is the motto of Disabled Peoples' International.

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Executive Summary

Following the September 2024 announcement from the Minister for Government Services and the NDIS, the Hon Bill Shorten MP, that registration of Platform Providers would soon become mandatory, PWDA welcomes the commitment from the NDIS Quality and Safeguards Commission (hereinafter referred to as the 'NDIS Commission') to consult with the community on these changes.¹

In responding to the consultation, PWDA has drawn on information from previous inquiries as well as a survey conducted with PWDA members and the disability community.

In this submission, PWDA recognises that Platform Providers offer significant advantages for NDIS participants and play a key role in ensuring individuals have choice and control over their supports. By acting as intermediaries between participants and providers, these platforms eliminate the administrative burden of directly employing workers, which can be a complex and time-consuming process. Additionally, platforms can provide more tailored options, allowing participants to choose providers who align with their values, needs, or cultural backgrounds, in a way that is more difficult when engaging with traditional large providers, which allocate individual workers.

PWDA also recognises however, that there are significant regulatory gaps in the current system and, in principle, supports the proposal to introduce mandatory registration for platforms for the purpose of safeguarding and ensuring quality of support for NDIS participants. Done well, PWDA believes that the registration of Platform Providers will help establish clearer service relationships, improve service safety and quality for participants and establish necessary accountability for platforms and workers.

Importantly, PWDA asserts that the success of this reform depends on genuine co-design with people with disability at all stages of policy development and implementation. Any

¹ NDIS Quality and Safeguards Commission (2024) *Consultation Paper: Registration of Platform Providers*, Australian Government, Canberra, p. 8.

registration framework must be developed in consultation with people with disability, ensuring it strengthens quality and safety without restricting participant choice, flexibility, or access to essential supports. Particular attention must be given to multiply marginalised communities, including First Nations people and those in rural, regional, and remote areas, to ensure that the reform does not inadvertently exacerbate existing service gaps.

Additionally, PWDA stresses that mandatory registration must be implemented in a way that does not deter workers from providing NDIS services or lead to increased costs that are passed onto participants. The registration process must be simple, streamlined, and proportionate to the size of providers and the types of supports they deliver. Platform Providers must not be required to impose excessive compliance burdens on individual workers, as this would likely reduce workforce availability, particularly in under-serviced areas.

Finally, ensuring a smooth transition to mandatory registration is critical. The NDIS Commission must adopt a phased approach that allows Platform Providers adequate time to comply while ensuring that participants do not experience disruptions to their supports. Clear, accessible information about registration requirements must be provided in multiple formats, including plain language guides, videos, and translated materials, to ensure all stakeholders understand the changes and how they will be implemented.

PWDA remains committed to working alongside the NDIS Commission, Platform Providers, and people with disability to ensure that any regulatory changes uphold the principles of choice and control, maintain access to essential services, and reflect the lived experience and expertise of people with disability.

Summary of Recommendations

Recommendation 1: Amend the definition of Platform Providers to:

- explicitly state that Platform Providers function as *online intermediaries*, connecting participants with workers rather than directly delivering services;
- explicitly state that Platform Providers function as *online intermediaries*, rather than being directly employed by the platform.

Recommendation 2: Require Platform Providers to clearly define service relationships as part of the registration process, ensuring participants and workers understand their legal rights and responsibilities. This will improve accountability, prevent harm, and clarify where responsibilities lie in cases of disputes or misconduct.

Recommendation 3: The NDIS Commission should require Platform Providers to ensure all workers meet NDIS worker screening requirements before offering services. Additionally, platforms should ensure workers have training that reflects the type of support they are providing. At minimum, training should cover areas such as human rights, the Convention on the Rights of Persons with Disabilities (CRPD), safeguarding and supported decision-making. This could be done, at least in part, through making more use of the NDIS training modules.

Recommendation 4: The NDIS Commission should, as part of the registration process, require Platform Providers to implement clearer cancellation policies to minimise last-minute disruptions for participants.

Recommendation 5: The Australian Government, NDIA and NDIS Commission should encourage incentives such as bonuses or free certified training for platforms and workers that provide higher intensity supports, as well as supports in under serviced markets and rural, regional, and remote areas.

Recommendation 6: In line with the recommendations of the NDIS Registration Taskforce, the NDIS Commission should require Platform Providers to establish clear, accessible, and consistently applied complaints mechanisms for both participants and workers and inform people of these processes when they sign up to the platform. As recommended by the Taskforce advice, the NDIS Commission should ‘publish a Practice Note or Guideline which sets out the process, timelines and handling of complaints. For example, a complaint should be acknowledged within 7 days and unless exceptional circumstances apply, resolved within 21 days.’²

Recommendation 7: The NDIS Commission must, as part of registration requirements, mandate consistent data collection and reporting for Platform Providers, including information on the types of supports provided, complaints, incidents of misconduct, participant demographics, service cancellations and availability of services, including in rural, regional and remote areas and in off-peak times.

Recommendation 8: The NDIS Commission must ensure that Platform Providers collect and store all information and data in accordance with all national privacy laws, including the Privacy Act 1988.

Recommendation 9: The NDIS Commission must also collect and store all information and data in accordance with all national privacy laws, including the *Privacy Act 1988*.

Recommendation 10: The NDIS Commission should ensure that registration requirements are simple and proportionate to the size of providers and the type of supports they provide.

Recommendation 11: When implementing mandatory registration for Platform Providers, the NDIS Commission should include provisions to screen workers. However, individual workers listing their services on digital platforms should not be required to register

² NDIS Provider and Worker Registration Taskforce (2024) *NDIS Provider and Worker Registration Taskforce Advice*. Australian Government, Department of Social Services. Permalink: www.dss.gov.au/node/2232, p. 62

separately. This will prevent duplicate obligations and avoid reducing workforce availability.

Recommendation 12: To prevent registration requirements from further limiting workforce availability in communities with existing shortages, such as First Nations and rural, regional, and remote areas, the NDIS Commission should collaborate with these communities through consultation and genuine co-design to develop appropriate worker obligations.

Recommendation 13: As part of registration requirements, the NDIS Commission should require Platform Providers should be required to implement accessible navigation systems with filters to help participants find workers who have specific expertise, speak specific languages or come from specific cultural or social backgrounds.

Recommendation 14: To prevent the cost of registration from being passed onto participants, the NDIS Commission must implement measures such as regulating platform fees, setting price caps, and ensuring that compliance costs are not duplicated in platform fees. Additionally, the NDIS Commission should avoid duplicating registration requirements across both Platform Providers and individual workers who list their services on the platforms.

Recommendation 15: To ensure a smooth transition to mandatory registration, the NDIS Commission should provide clear, accessible information in multiple formats, including plain language guides, videos, infographics, and translated materials, co-designed with people with disability. Direct updates should be provided to participants and providers through multiple channels and co-design with people with disability should be embedded in the transition process.

Recommendation 16: To ensure continuity of supports during the transition to mandatory registration for Platform Providers, the NDIS Commission should implement a phased transition approach with time allowed for Platform Providers to register, without

participants who use them losing their supports in the interim. Additionally, there should be clear contingency plans for participants whose regular providers face delays in registration. Through the transition period, the NDIS Commission should maintain communication with Platform Providers and disability representative organisations to monitor and address emerging issues.

Recommendation 17: The NDIS Commission must ensure that the implementation of mandatory registration processes for Platform Providers aligns with existing and emerging NDIS frameworks, particularly those relating to self-directed supports and self-management, to avoid conflicting requirements.

Recommendation 18: The NDIS Commission should ensure that mandatory registration for Platform Providers aligns with broader NDIS provider registration reforms. While Platform Providers should be held to equivalent standards as traditional providers, the registration framework must account for the unique nature of platform-based service delivery to avoid unnecessary administrative burdens and maintain participant choice and flexibility.

Recommendation 19: The NDIS Commission must engage in genuine co-design with people with disability and representative organisations at every stage of the policy design and implementation process. This should include prioritising input from multiply marginalised communities to ensure that registration requirements enhance safety and quality without restricting choice, autonomy, or access to supports.

Background to Consultation

In 2023, the NDIS Commission conducted an Own Motion Inquiry into Platform Providers (hereinafter referred to as the 'Own Motion Inquiry'), which recognised the role of Platform Providers as intermediaries between NDIS participants and service providers. The Inquiry found that platforms offer an alternative to traditional provider models, enabling participants to exercise choice and control over their supports without the complexity of directly employing workers. Participants highlighted several benefits, such as the ability to access support on short notice or while traveling, personally selecting workers instead of being assigned one by a large provider, and using filters to find workers who align with their values or cultural background.³

However, the Own Motion Inquiry also identified key concerns, including uncertainty around the service relationship between participants and platform-based providers, inconsistencies in worker screening and training, variable and sometimes excessive pricing, limited avenues for complaints, and gaps in data collection, security, and consistency.⁴

While the Own Motion Inquiry report did not make specific recommendations about how to solve these issues, it did highlight a need for increased visibility and monitoring of all platforms that are intermediaries for accessing NDIS services.⁵

Building on the findings of the Own Motion Inquiry as well as the NDIS Review⁶ and the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability,⁷ the NDIS Provider and Worker Registration Taskforce (hereinafter referred to as the 'NDIS Registration Taskforce') recommended in 2024 that all Platform Providers

³ NDIS Quality and Safeguards Commission (2023) *Insights Report: Own Motion Inquiry into how Platform Providers operate in the NDIS Market* Australian Government, Canberra, pp. 7-9.

⁴ Ibid.

⁵ Ibid, p. 29.

⁶ NDIS Review (2023) *Working together to deliver the NDIS. Independent Review into the National Disability Insurance Scheme Final Report*. Commonwealth of Australia, Department of the Prime Minister and Cabinet, ISBN 978-1-925365-34-4

⁷ Australian Government (2025) 'Royal Commission into Violence Abuse, Neglect and Exploitation of People with Disability,' Commonwealth of Australia.

that provide NDIS services be registered and that the type of registration or registration requirements should depend on the type of supports being provided.⁸

Alongside this recommendation, NDIS Registration Taskforce' recommended that the following Provider Obligations be included for registration, including for Platform Providers:

- Adherence to the NDIS Code of Conduct
- Worker screening
- Complaints mechanisms
- Incident Reporting
- Practice Standards
- Regular Check-Ins with the NDIS Commission
- Performance Measurement.⁹

On 16 September 2024, the Minister for Government Services and the NDIS, the Hon Bill Shorten MP announced that mandatory registration of all Platform Providers a priority. Following this announcement, the present consultation was launched to seek community feedback about registering all Platform Providers with the NDIS Commission to deliver NDIS supports.¹⁰

For the purpose of the consultation, Platform Providers have been defined as 'NDIS providers that use profile-based platforms to connect participants with workers to deliver NDIS supports, such as through an app or website where NDIS participants and workers

⁸ NDIS Provider and Worker Registration Taskforce (2024) *NDIS Provider and Worker Registration Taskforce Advice*. Australian Government, Department of Social Services. Permalink: www.dss.gov.au/node/2232, p. 5.

⁹ Ibid, pp. 62-63.

¹⁰ NDIS Quality and Safeguards Commission (2024) *Consultation Paper: Registration of Platform Providers*, Australian Government, Canberra, p. 5.

create a profile.¹¹ Examples of Platform Providers include platforms like HireUp and Mable.¹²

Specifically, the NDIS Commission is requesting feedback on:

- a. defining Platform Providers
- b. registering Platform Providers to support quality, safety, choice and innovation.

In responding to the consultation paper,¹³ PWDA has drawn on information from past inquiries, as well as the views of our members and the broader disability community, which PWDA captured through a community survey.

PWDA Survey

In January 2025, PWDA launched a survey to gain feedback from its members and the broader disability community on the mandatory registration of Platform Providers, supported independent living (SIL) and support coordination. In regards to the mandatory registration of Platform Providers, the survey asked questions about how many respondents had used Platform Providers, any benefits or issues they had experienced with using platforms and what their views were on how mandatory registration would impact their access to supports.

In total, the survey was open for approximately three weeks and gained a total of 187 responses. 64% of these were from NDIS participants, 20% were from people with disability who are not NDIS participants and 33% were family members or carers of NDIS

¹¹ NDIS Quality and Safeguards Commission (2024) [Consultation Paper: Registration of Platform Providers](#), Australian Government, Canberra, p. 11.

¹² NDIS Quality and Safeguards Commission (2023) [Insights Report: Own Motion Inquiry into how Platform Providers operate in the NDIS Market](#) Australian Government, Canberra, p. 23.

¹³ NDIS Quality and Safeguards Commission (2024) [Consultation Paper: Registration of Platform Providers](#), Australian Government, Canberra.

participants. Among these respondents, more than half (55%) of which were from individuals who said they had used Platform Providers.

In the responses, participants mostly gave feedback which reflected the findings of previous inquiries. In response to a question about the benefits of Platform Providers for example, 92% said that they benefited from having ‘choice and control over supports,’ 83% said they benefited from being able to access and manage supports ‘without directly employing support workers,’ 79% said that they value the ‘flexibility’ Platform Providers offer and 50% of those said that they had benefited from being able to use ‘filters to find the right supports (e.g. supports that are LGBTIQ+ friendly). Some respondents elaborated that they loved the flexibility and control they had with Platform Providers in comparison to traditional providers.

“FREEDOM - I will NEVER go back to traditional service providers EVER again.”

“I am not at the whim of a big company who will change the worker without notice.”

Despite the benefits of using Platform Providers, participants also agreed that significant improvements are needed to ensure the quality and safety of supports accessed through platforms. Similar to the feedback gained in the Inquiry, respondents described experiencing issues with things like worker competence and ability to provide safe and trauma informed services. Other issues raised included bookings being subject to last minute cancellations, workers opting only to do ‘easier’ support jobs, over more high intensity supports and a lack of availability of workers at off peak times and in rural, regional and remote areas.

“Because they are self employed, they are free to stop providing services when they wish. Availability is not guaranteed, so I have gone to an organisation for essential morning supports.”

“They never have the days and times I want.”

“It will not help participants in regional, rural or remote areas where there are already not many support workers available.”

“No listings in regional areas so it's completely useless.”

While there was no consensus in the survey responses over whether mandatory registration should be implemented for Platform Providers, with some respondents in support and others stating that they did not believe registration would improve the quality of supports; there did seem to be agreement that registration, done well and in combination with other measures, may be effective.

When asked if they thought registration “will improve the safety and quality of supports accessed through Platform Providers?”, respondents said things like:

“Yes & no. It's the auditing of supports that needs to be looked into. Even for organisations, who are registered, they are often seen doing the wrong things. Registration doesn't really prevent poor supports.”

“I understand the reasoning behind mandatory registration but of itself it won't necessarily improve safety and quality. This comes down to vetting of the worker.”

“I'm not sure that mandatory anything helps anyone. There needs to be a genuine desire to do right by others and those who don't need to be found and weeded out.”

“Registration alone does nothing. There needs to be strong standards, an easy accessible and timely way to report, and a body with power and resources to act on breaches.”

Response to Consultation Questions

a. Definition

- i. What are the benefits and risks of the approach we are considering to define Platform Providers? What other features could we include?**

For the purpose of the consultation, Platform Providers have been defined as ‘NDIS providers that use profile-based platforms to connect participants with workers to deliver NDIS supports, such as through an app or website where NDIS participants and workers create a profile.’¹⁴ Examples of Platform Providers include platforms like HireUp and Mable.¹⁵

The NDIS Commission is seeking feedback on how to define Platform Providers in a way that captures both existing and emerging models. They have suggested that the definition should include a foundational description of a platform-based service, recognition that Platform Providers collect fees, a description of their role in facilitating worker-participant service relationships, and clarity on the distinction between platform services (the digital infrastructure) and the actual services delivered through these platforms (such as personal care or allied health services).¹⁶

A key benefit of the proposed definition is that it would promote consistency among Platform Providers, ensuring that the NDIS Commission can monitor different types of platforms and ensure they meet obligations associated with quality and safety assurance. Additionally, establishing a clear definition of a regulatory category for Platform Providers

¹⁴ NDIS Quality and Safeguards Commission (2024) *Consultation Paper: Registration of Platform Providers*, Australian Government, Canberra, p. 11.

¹⁵ NDIS Quality and Safeguards Commission (2023) *Insights Report: Own Motion Inquiry into how Platform Providers operate in the NDIS Market* Australian Government, Canberra, p. 23.

¹⁶ NDIS Quality and Safeguards Commission (2024) *Consultation Paper: Registration of Platform Providers*, Australian Government, Canberra, p. 6.

would help define the roles of platforms, workers and participants and clarify their relationship, which previous inquiries have shown is currently unclear.¹⁷

However, while the need for a definition of Platform Providers is apparent, there are risks if the definition is either too broad or too narrow. A definition that is too narrow could create gaps in coverage, allowing some platforms to operate without sufficient safeguards. Some hybrid or emerging models might not fit neatly within the proposed criteria, potentially leaving participants exposed to unregulated service arrangements. On the other hand, an overly stringent definition could impose excessive regulatory requirements, limiting innovation, reducing the flexibility that makes platform-based services appealing to participants, as well as undermining access to essential services for many high priority communities such as first nations and rural, regional and remote communities where service alternatives are limited, at capacity or unavailable.¹⁸

As it stands, the proposed definition appears to meet a good balance between being too narrow and too stringent, but feedback suggests that it needs some work to adequately cover the unique position of platforms. Specifically, some respondents to the PWDA survey, indicated that the definition should specify the role of platforms as an online 'intermediary' between providers and participants, recognising that their role is to provide a digital means to connect participants with workers and that this is different to service provision of traditional providers, which provide support directly to participants.

“The word Online should be included.”

“Maybe include word 'intermediate.’”

Additionally, some respondents suggested clarifying in the definition, to specify the relationship between the provider and the workers as one that involves gig or contract work.

¹⁷ NDIS Quality and Safeguards Commission (2023) *Insights Report: Own Motion Inquiry into how Platform Providers operate in the NDIS Market* Australian Government, Canberra, pp. 19, 27.

¹⁸ Ibid, p. 16; NDIS Provider and Worker Registration Taskforce (2024) *NDIS Provider and Worker Registration Taskforce Advice*. Australian Government, Department of Social Services. Permalink: www.dss.gov.au/node/2232, pp. 44-45.

“Maybe add something about the gig economy (direct, short-term hire, fees paid to the platform for listing) nature of these platforms. Versus agencies, which employ workers directly. Yet may provide choice of worker, profiles for workers, with benefits and input into the running of the agency.”

“I would like something added about it being a gig economy I.e. the workers are either employed on a casual basis or are independent contractors to the service.”

Recommendation 1: Amend the definition of Platform Providers to:

- explicitly state that Platform Providers function as *online intermediaries*, connecting participants with workers rather than directly delivering services;
- include an acknowledgement that many platform workers operate as independent contractors or casual employees, rather than being directly employed by the platform.

b. Registration of Platform Providers

i. How can the registration of Platform Providers support Platform Providers to deliver high quality and safe services?

As indicated by previous inquiries,¹⁹ it is clear that increased monitoring and oversight of Platform Providers is an essential to ensure that services delivered through digital platforms are providing safe and quality services. Among survey responses, PWDA members were split on their views about whether the mandatory registration of Platform Providers would be effective at improving the quality and safety of services, with 52% of those who responded to the question saying it would be effective, 24% saying it wouldn't be effective and 11% saying they were 'unsure' If registration of Platform Providers would

¹⁹ See e.g. NDIS Quality and Safeguards Commission (2023) *Insights Report: Own Motion Inquiry into how Platform Providers operate in the NDIS Market Australian Government*, Canberra, pp. 6.

be effective improving the quality and safety of services. However, there was agreement that registration, done well and in combination with other measures, may effectively address issues safeguarding and quality issues.

Clarification of Service Relationships

One of the key issues identified in previous inquiries, including the 2023 NDIS Commission's Own Motion Inquiry into Platform Providers, is the lack of clarity regarding service relationships.²⁰ Noting that many participants and workers struggle to understand their legal and contractual obligations when engaging with a Platform Provider,²¹ registration should require Platform Providers to clearly outline their role in the service relationship and what their legal rights and responsibilities are. Ideally, this clarification would prevent participants from being unnecessarily harmed and ensure accountability in cases of service failures, disputes, or misconduct. For example, if a participant experiences harm or financial exploitation, they need to know whether the platform has responsibilities regarding worker conduct, insurance, and dispute resolution, or if this responsibility sits with the worker/s.

Recommendation 2: Require Platform Providers to clearly define service relationships as part of the registration process, ensuring participants and workers understand their legal rights and responsibilities. This will improve accountability, prevent harm, and clarify where responsibilities lie in cases of disputes or misconduct.

Worker Checks Screening and Training

Ensuring that workers providing NDIS supports through platforms have adequate training and screening is another essential component of a high-quality service system. At present, evidence suggests that there is no uniform requirement for platform-based workers to undergo NDIS worker screening or disability-specific training,²² resulting in inconsistent service quality and potential safety risks. As some respondents outlined in the PWDA

²⁰ NDIS Quality and Safeguards Commission (2023) *Insights Report: Own Motion Inquiry into how Platform Providers operate in the NDIS Market* Australian Government, Canberra, pp. 19, 27.

²¹ Ibid.

²² Ibid, p. 25; NDIS Provider and Worker Registration Taskforce (2024) *NDIS Provider and Worker Registration Taskforce Advice*. Australian Government, Department of Social Services. Permalink: www.dss.gov.au/node/2232, p. 46.

survey there should be a minimum standard of training to increase competency and knowledge for potential and current workers offering supports via a Platform Providers.

“Make sure that service providers staff have the appropriate training in working with people who have disabilities.”

“Mandatory training on human rights, supported decision making support, NDIS worker screening check AND police check AND working with children check AND international screening check.”

“All support providers including platform providers should undergo the same accreditation and screening for the safety and quality of consumers with a disability”

Registration should require Platform Providers to ensure all workers meet NDIS worker screening requirements before they are permitted to offer services. Additionally, there should be a mandatory minimum standard of training, including modules on disability rights, person-centred care, and trauma-informed support. As was highlighted by some PWDA members, , trauma-informed training is particularly important for ensuring that workers understand how to provide safe and appropriate support for participants with trauma histories.

“People lacked basic knowledge, and the standard of care was dismal. Unprofessional, zero professional boundaries, extremely unsafe for someone like me with an extensive trauma background.”

Recommendation 3: The NDIS Commission should require Platform Providers to ensure all workers meet NDIS worker screening requirements before offering services. Additionally, platforms should ensure workers have training that reflects the type of support they are providing. At minimum, training should cover areas such as human rights, the Convention on the Rights of Persons with Disabilities (CRPD), safeguarding and supported decision-making. This

could be done, at least in part, through making more use of the NDIS training modules.

Incentives to Address Service Gap Issues

Another concern that became apparent through PDWA's member survey was service bookings being subject to last-minute cancellations, creating significant instability for participants relying on scheduled supports.

"It is very annoying when people on the platform do not respond to messages. I feel the platform providers should monitor this and ensure responses are mandatory to save time wasting. There is no follow up from the providers (even when requested) for workers who constantly don't show for meetings or shifts with no explanation."

"Because they are self-employed, they are free to stop providing services when they wish. Availability is not guaranteed."

"Late cancellations of support with no back up."

Moreover, many respondents said that workers often opt for 'easier' support jobs, such as those involving community outings, rather than taking on higher intensity supports or personal care supports that are needed by some participants. Survey respondents also noted there is a lack of workers available in rural, regional and remote areas and in off-peak times, such as in the evenings and on weekends and these – \ issues are reflected in other studies and inquiries.²³

"Some kind of way of enforcing that people can't just take the easy shifts, cups of tea and social outings. It's very difficult to compete when people can get the same alley right for doing that, cleaning up [continence] accidents, washing people, hoisting, managing

²³ See e.g NDIS Quality and Safeguards Commission (2023) *Insights Report: Own Motion Inquiry into how Platform Providers operate in the NDIS Market Australian Government, Canberra*, p. 11.

challenging and changing situations, thinking on their feet. But we need their services so we can survive. What we wouldn't want to see happen is that the platform providers only have the level of support like social outings and people companies providing.”

“Hard to find right person in rural region.”

“Connectivity issues, providers not available in regional, rural and remote areas.”

To address these challenges moving forward, it is essential that the registration process for Platform Providers include measures to ensure cancellations are minimised and more reliable support options are available. This could involve mandating as part of the registration process that Platform Providers establish clearer cancellation policies, with penalties or alternative arrangements for last-minute cancellations to reduce disruption for participants.

Additionally, the Australian Government, NDIA and NDIS Commission should encourage Platform Providers to create incentives for workers to take on roles that involve providing higher intensity supports or providing supports in rural, regional and remote areas. This could include offering bonuses or free certified training; the latter of which would align with the recommendations made by the NDIS Registration Taskforce in regard to registering providers that offer higher risks supports to participants.²⁴

Recommendation 4: The NDIS Commission should, as part of the registration process, require Platform Providers to implement clearer cancellation policies to minimise last-minute disruptions for participants.

Recommendation 5: The Australian Government, NDIA and NDIS Commission should encourage incentives such as bonuses or free certified training for platforms and workers

²⁴ NDIS Provider and Worker Registration Taskforce (2024) *NDIS Provider and Worker Registration Taskforce Advice*. Australian Government, Department of Social Services. Permalink: www.dss.gov.au/node/2232, p. 8

that provide higher intensity supports, as well as supports in under serviced markets and rural, regional, and remote areas.

Complaints mechanisms

Another essential aspect of mandatory registration is the inclusion of robust and accessible complaints processes for workers and participants. Past reviews have found that complaint processes on Platform Providers are often difficult to navigate and inconsistently applied²⁵ – issues which were also reflected in responses to the PWDA survey.

“2 year plus complaint with NDIS Quality and Safety Commission. The staff are trying to hide behind any rule they can find because they appear to not be able to address my complaint.”

“Repeated issues. They lack basic accountability for their workers.”

“It's unclear what to do when a worker behaves inappropriately or unsafely.”

Recommendation 6: In line with the recommendations of the NDIS Registration Taskforce, the NDIS Commission should require Platform Providers to establish clear, accessible, and consistently applied complaints mechanisms for both participants and workers and inform people of these processes when they sign up to the platform. As recommended by the Taskforce advice, the NDIS Commission should ‘publish a Practice Note or Guideline which sets out the process, timelines and handling of complaints. For example, a complaint should be acknowledged within 7 days and unless exceptional circumstances apply, resolved within 21 days.’²⁶

²⁵ NDIS Quality and Safeguards Commission (2023) *Insights Report: Own Motion Inquiry into how Platform Providers operate in the NDIS Market* Australian Government, Canberra, p. 35.

²⁶ NDIS Provider and Worker Registration Taskforce (2024) *NDIS Provider and Worker Registration Taskforce Advice*. Australian Government, Department of Social Services. Permalink: www.dss.gov.au/node/2232, p. 62

Data Collection

Consistent data collection requirements are crucial for improving service oversight and identifying systemic issues. At present, Platform Providers collect and retain data in different ways, with minimal standardisation and inconsistent external reporting requirements.²⁷ This creates gaps in understanding how platform services operate, where safety risks emerge and how participants experience platform-based supports. To address this concern, registration should mandate regular data reporting to the NDIS Commission, including information such as complaints received and recorded incidents of misconduct.

It should be noted that the type of support a participant receives and duration the support is received for can impact the risk of harm, information should be reported on what type of supports are received by participants using Platform Providers and how they correlate to complaints and misconduct reports. The NDIS Registration Taskforce, noted that risk to participants can increase depending on the type of supports being provided and the length of time they are being provided for. An example of this is participants receiving personal and intimate care 24 hours a day, who experience significantly higher risks than someone receiving the same care for only two hours a day.²⁸ Reflecting this, the NDIS Registration Taskforce recommended there be different registration categories according to the risk associated with the supports being provided and that this should apply to Platform Providers in the same way as to traditional providers.²⁹

While the nature of Platform Providers usage provides some natural safeguards, such as the ability to choose workers and stop and start services according to participant preference, anecdotal stories from participants suggest that monitoring of supports is still necessary in this context to ensure participants aren't subject to unsafe or traumatic circumstances.

²⁷ NDIS Quality and Safeguards Commission (2023) *Insights Report: Own Motion Inquiry into how Platform Providers operate in the NDIS Market* Australian Government, Canberra, p. 26.

²⁸ NDIS Provider and Worker Registration Taskforce (2024) *NDIS Provider and Worker Registration Taskforce Advice*. Australian Government, Department of Social Services. Permalink: www.dss.gov.au/node/2232, p. 32.

²⁹ *Ibid*, p. 5.

“The pattern of supports I am seeing is very entitled workers. ... There have been many times when after a period of usage I realise they need breaks, arrive late, leave early, tell me their bored with my exercise program, can I ask for a new one! My constant issue with platform supports is you are extremely vulnerable and can be easily put in a position of "managing their needs" as no one is supervising how they are working with me. I consider participants in their homes under the NDIS are more vulnerable to abuse than participants in a group house setting as no one checks in sporadically on how they are going in their shift.”

“People lacked basic knowledge, and the standard of care was dismal. Unprofessional, zero professional boundaries.”

In the context of Platform Provider registration, data collection requirements should include demographic and NDIS plan information about participants, ensuring that the NDIS Commission and Platform Providers can monitor who is using platform-based services and whether certain groups experience barriers to access or disparities in service quality. This data should capture key factors such as gender, race, ethnicity, disability type, geographic location, and socioeconomic status, while ensuring compliance with privacy and ethical data collection standards.

“They give my details to completely the wrong people. I was sent a woman who hated dogs. I have a guide dog. Stupid process made it impossible to get my name off the platform database. NDIA are hopeless and don't help. and the NQSC is a joke. They didn't even want to know because it's not abuse. I beg to differ. My personal details are all very important to me.”

Currently, the data available reflects broader research regarding the difficulties some groups face with accessing supports.³⁰ Participants who are First Nations and those who

³⁰ See e.g. NDIS Review (2023) *Working together to deliver the NDIS: Final Report*, Independent Review of the National Disability Insurance Scheme, Australian Government, pp.186-197

live in rural, regional and remote areas are drastically underrepresented among Platform Provider users.³¹ This also reflects feedback given in the PWDA survey.

“No listings in regional areas so it's completely useless.”

However, while the data available does give some important insights into participants who uses Platform Providers, the data captured and reported currently differs between Platform Providers,³² creating difficulties with monitoring changes or improvements over time or across platforms.

Recommendation 7: The NDIS Commission must, as part of registration requirements, mandate consistent data collection and reporting for Platform Providers, including information on the types of supports provided, complaints, incidents of misconduct, participant demographics, service cancellations and availability of services, including in rural, regional and remote areas and in off-peak times.

Recommendation 8: The NDIS Commission must ensure that Platform Providers collect and store all information and data in accordance with all national privacy laws, including the Privacy Act 1988.

Recommendation 9: The NDIS Commission must also collect and store all information and data in accordance with all national privacy laws, including the *Privacy Act 1988*.

ii. How can the registration of Platform Providers ensure that innovation and choice and control are maintained and encouraged?

To ensure that innovation, choice, and control are maintained and encouraged in the registration of Platform Providers, the process must be designed to support diverse service offerings that address the needs of NDIS participants whilst remaining accessible and realistic for providers.

³¹ NDIS Quality and Safeguards Commission (2023) *Insights Report: Own Motion Inquiry into how Platform Providers operate in the NDIS Market Australian Government, Canberra*, p. 7.

³² *Ibid*, p. 26.

Simple Registration Requirements

It is of utmost importance that any registration requirements are simple and straightforward, for the process to be accessible and realistic for providers, so that the process does not disadvantage small providers, providers with fewer resources and providers serving marginalised or multiply disadvantaged cohorts within the NDIS participant community. As PWDA has highlighted in multiple previous submissions,³³ we are concerned that introducing overly burdensome, time consuming or costly registration processes risks pushing out services that are smaller, or more specialised, or who otherwise have limited administration capacity. While it is likely that most Platform Providers would be large enough to handle administration associated with maintaining registration, it is worth noting some, Platform Providers only engage a small number of NDIS participants, which would not justify their increasing administrative burden.

Recommendation 10: The NDIS Commission should ensure that registration requirements are simple and proportionate to the size of providers and the type of supports they provide.

Registration Required for Platforms, Not Workers

PWDA believes registration should be required for the Platform Providers themselves, rather than individual workers. While it's crucial to ensure workers are properly trained, screened, and held accountable, imposing individual registration requirements for workers could deter workers who previously provided worked as sole-traders or contractors operating solely through platforms.

While PWDA acknowledges that an alternate option being proposed for participants to use unregistered workers is through registering for self-directed supports and directly employing workers, it likely that the administrative burden associated self-directing supports will be prohibitive for many individuals, leaving no other option but to use NDIS registered providers. As NDIS Registration Taskforce identified in its advice, accessing

³³ See e.g.

support through Platform Providers is an appealing option for these individuals,³⁴ offering the flexibility to access individual workers without the burden of direct employment.

The NDIS Registration Taskforce in its report also recommended a worker registration scheme,³⁵ however, PWDA warns that applying this to workers who are already being screened and vetted through Platform Providers registration obligations is a duplication of safeguards that would likely only serve to decrease support options for participants. This would particularly impact participants who require workers from specific geographic or cultural backgrounds, and such processes may be associated with increased barriers to registration.³⁶

“For sole providers (support workers etc) it may make them quit.”

“It will take away choice and control and give rural and remote people less workers to work with, as they are all leaving the industry if they are required to register been advised.”

“Our nonprofit cannot conform to new requirements, so we would need exemption from these by virtue of nfp status and philosophy of peer , basis , reciprocity of support , not professional and client model.”

Focusing on platform-level registration instead of registering individual workers, would provide more flexibility in the workforce, making it easier for workers to provide services across multiple platforms and allow participants to access a larger pool of available workers.

³⁴ NDIS Provider and Worker Registration Taskforce (2024) *NDIS Provider and Worker Registration Taskforce Advice*. Australian Government, Department of Social Services. Permalink: www.dss.gov.au/node/2232, p. 45.

³⁵ *Ibid*, p. 8.

³⁶ For some people who are First Nations and/or from rural, regional and remote locations for example, the NDIS Registration Taskforce found that it can be common to have limited access to identification or other key legal forms of documentation as well as access to at home internet and Information, Communication and Technology (ICT) equipment, all of which are often essential for meeting registration obligations.

Recommendation 11: When implementing mandatory registration for Platform Providers, the NDIS Commission should include provisions to screen workers. However, individual workers listing their services on digital platforms should not be required to register separately. This will prevent duplicate obligations and avoid reducing workforce availability.

Flexibility must be Maintained for Marginalised Cohorts

As PWDA has highlighted in previous submissions,³⁷ measures must be put in place to ensure that increased administrative obligations associated with registration, worker screenings and checks do not decrease the number of workers available in communities that already have under-serviced markets, such as in First Nations communities and regional rural and remote locations. As it stands, First Nations and rural, regional and remote communities already face significant barriers to accessing supports, with traditional registered providers often being unavailable or unsuitable³⁸ and workers available on platforms being extremely limited.

For these reasons, it is essential that increased requirements on workers, implemented through platform registration, do not further decrease availability of supports for these cohorts. In order to mitigate this, it is crucial the NDIS Commission work alongside these communities through consultation and genuine co-design to determine what appropriate obligations would look like.

Additionally, registration should require Platform Providers, to implement accessible navigation systems and support them through training and resource distribution, which should include filter functions that allow participants to find workers with specific expertise or cultural backgrounds. The Own Motion Inquiry and PWDA's survey, both reinforced the reality that many people with disability who use Platform Providers, benefit significantly

³⁷ See e.g. People with Disability Australia (2024) [Here to Stay – Working to future proof the NDIS](#), People with Disability Australia, Sydney

³⁸ See e.g. Independent Review of the National Disability Insurance Scheme, *Working together to deliver the NDIS: Final Report*, 27 October 2023, 186-197; Lathouris, O (2024) 'The power of the NDIS and the fight to keep it in remote Australia,' *ABC News Online*, Viewed 24 January 2024 < <https://www.abc.net.au/news/2024-09-06/ndis-remote-regional-nt-services-access-struggles/104301124>>.

from the ability to use filters to find workers who are inclusive of diverse identities, such as culturally and linguistically diverse (CaLD) people and LGBTIQ+ communities.³⁹

“A participant from a CaLD background may also prefer someone from a similar background.”

Recommendation 12: To prevent registration requirements from further limiting workforce availability in communities with existing shortages, such as First Nations and rural, regional, and remote areas, the NDIS Commission should collaborate with these communities through consultation and genuine co-design to develop appropriate worker obligations.

Recommendation 13: As part of registration requirements, the NDIS Commission should require Platform Providers should be required to implement accessible navigation systems with filters to help participants find workers who have specific expertise, speak specific languages or come from specific cultural or social backgrounds.

Ensure Cost is Not Passed onto Participants

A key issue identified in previous inquiries is the duplication of costs within Platform Providers models, where fees are charged to both participants and providers but ultimately both come from participant funding.⁴⁰ As highlighted in the Own Motion Inquiry, platforms deduct a percentage from provider earnings while also charging service or subscription fees to participants, creating layered costs that reduce the funding available for direct support.⁴¹ This was also an issue raised in some responses to the PWDA survey:

“Requiring a platform to be registered will require the service provider to increase their fees which will in turn be passed on to the participant. Also, I am unsure about what requirements the NDIA has with regards to service providers, but service

³⁹ NDIS Quality and Safeguards Commission (2023) *Insights Report: Own Motion Inquiry into how Platform Providers operate in the NDIS Market Australian Government, Canberra*, pp. 7, 15.

⁴⁰ *Ibid.*, pp. 22-24.

⁴¹ *Ibid.*

providers impose a minimum time for support workers. Using platform providers probably does not require this.”

“I will not be able to have my independent sole trader SW's and prices will raise.”

“I hope though that there will be standards of practice that reduce over-billing.”

Given that mandatory registration will inevitably increase administrative work for providers and platforms, PWDA is concerned the cost of this work will also be passed onto NDIS participants. If double registration obligations arise, where both the platform and workers must be NDIS registered, this will lead to increased compliance costs that may be passed onto participants and undermine the quality of supports for participants as well as being less financially efficient for participants and the NDIA alike.

To prevent the aforementioned outcomes, the registration process must include measures reduce or eliminate the need for platforms to shift costs onto participants, such as regulating platform fees, and putting price caps on services. Without appropriate safeguards, registration could inadvertently limit participant choice by making platform-based supports less affordable. By establishing clear oversight and pricing guidelines, the system can balance regulation with accessibility, ensuring participants are not financially disadvantaged for using Platform Providers.

Recommendation 14: To prevent the cost of registration from being passed onto participants, the NDIS Commission must implement measures such as regulating platform fees, setting price caps, and ensuring that compliance costs are not duplicated in platform fees. Additionally, the NDIS Commission should avoid duplicating registration requirements across both Platform Providers and individual workers who list their services on the platforms.

iii. *How can the NDIS Commission ensure a smooth transition to mandatory registration for participants, workers and providers?*

A well-planned transition to mandatory registration for Platform Providers is essential to minimise service disruption, ensure compliance, and protect participant choice and control and continuity of supports. The NDIS Commission can facilitate this transition by providing clear information and resources, co-designed with participants, offering training for both participants and workers, and ensuring continuity of supports for individuals.

Provision of Information and Resources

The success of mandatory registration will depend on effective communication and education. Many participants, workers, and Platform Providers may be unfamiliar with the registration process or uncertain about how it will affect them. The NDIS Commission should ensure that accessible, easy-to-understand information is widely distributed through multiple channels, including NDIS newsletters, social media, provider networks, Disability Representative Organisations (DROs) and digital platforms themselves.

In the PWDA survey, some specific ways respondents suggested this could be done included:

- Clear and simplified information and processes for registration

“Simple to follow information on requirements for registration. Low fees.”

“Actual break down information of requirements.”

- Information in multiple, accessible formats

“ Plain language guides explaining what mandatory registration means, who it applies to, and what the process involves. • Easy-read and translated materials for people with disabilities and those from non-English-speaking backgrounds. • Infographics and videos to break down complex information into digestible steps. • A dedicated website or portal with FAQs, key dates, and checklists.”

“Costs, detailed how-to guides”

“Plain English statements, videos and visual diagrams of what registration will offer.”

- Direct updates for participants and providers

“Contact participants who use Platforms and let them know when mandatory registration is starting and how it will change their use of the service.”

“Clear written & verbal communication with all NDIS recipients of what mandatory registration means, especially those with an intellectual impairment.”

“Facts about what the provider or their workers must do and change to current operation being clear. Providers should not be putting prices up if there is not an ongoing change in how they work.”

“Information should come from LACs, Support Coordinators etc. to tell participants and providers + running educational sessions for providers. I don't know how unregistered solo providers will get reached- maybe having the NDIS send out letters/emails to all providers who get invoices paid?”

- Ways to identify registration status of providers

“Awareness of how to check if providers are registered- look for a logo on their website? How to make complaints if needed”

- Co-Design with people with disability

“Meaningful co-design with disabled people. Some concern for actual safety and quality would be good, too - as registration does not guarantee anything but pushing small providers out.”

Recommendation 15: To ensure a smooth transition to mandatory registration, the NDIS Commission should provide clear, accessible information in multiple formats, including plain language guides, videos, infographics, and translated materials, co-designed with people with disability. Direct updates should be provided to participants and providers through multiple channels and co-design with people with disability should be embedded in the transition process.

Ensure Continuity of Supports

A critical aspect of the transition to mandatory registration is ensuring that participants do not experience service disruptions due to delays in Platform Providers registration or compliance requirements. Many participants rely on platform-based services for daily support, personal care, and community access;⁴² meaning that any gaps in service delivery could have serious consequences for their safety, wellbeing and independence.

To prevent disruptions, the NDIS Commission should implement a phased transition approach, allowing providers sufficient time to meet new registration requirements while continuing to operate – especially if both Platform Providers and the workers listed on them are required to meet new registration requirements.

“The change guideline & having plenty of time for registration. A cross over period, so that people being supported doesn’t lose their current supports short term.”

Additionally, there should be clear contingency plans for participants whose regular providers face delays in registration, ensuring they can still access support and are not left in a service gap as a result of complex bureaucracy. The NDIS Commission should also work closely with Platform Providers, disability advocacy organisations, and participant-led networks to monitor the transition and respond quickly to emerging issues, preventing unintended service gaps.

⁴² Ibid, pp. 7, 8, 15.

Recommendation 16: To ensure continuity of supports during the transition to mandatory registration for Platform Providers, the NDIS Commission should implement a phased transition approach with time allowed for Platform Providers to register, without participants who use them losing their supports in the interim. Additionally, there should be clear contingency plans for participants whose regular providers face delays in registration. Through the transition period, the NDIS Commission should maintain communication with Platform Providers and disability representative organisations to monitor and address emerging issues.

Moving Forward and Conclusion

Moving forward, ensuring the registration process for Platform Providers strikes a balance between ensuring the safety and quality of services, whilst avoiding decreasing choice and control for participants will be essential for meeting the identified issues, while maintaining the effectiveness of Platform Providers services.

To avoid implementing contradicting frameworks, the NDIS Commission must also ensure alignment of this reform with existing and emerging NDIS frameworks, including those relating self-directed supports and the broader mandatory provider registration process. At every stage of design and implementation, co-design with people with disability and representative organisations must also remain central.

Alignment with Self-Management and Self-Directed Supports Arrangements

Many NDIS participants use Platform Providers as a way to exercise greater choice and control over their supports, particularly those who self-manage their funding. It is essential that registration requirements do not undermine the flexibility that makes Platform Providers valuable. Regulation should ensure necessary safeguards without adding excessive administrative burdens that could make it harder for participants to directly

engage with workers or otherwise deter workers from offering services through platforms. The NDIS Commission should also ensure that platform-based models remain economically viable for both participants and providers and that mandatory registration does not inadvertently result in providers passing excessive administrative costs onto participants.

Recommendation 17: The NDIS Commission must ensure that the implementation of mandatory registration processes for Platform Providers aligns with existing and emerging NDIS frameworks, particularly those relating to self-directed supports and self-management, to avoid conflicting requirements.

Alignment with Mandatory Registration of Other Providers

The introduction of mandatory registration for Platform Providers must be consistent with broader NDIS reforms to provider registration. Given that traditional providers are also moving toward mandatory registration, the NDIS Commission should ensure that Platform Providers are held to equivalent standards while recognising the unique nature of their service model.

Recommendation 18: The NDIS Commission should ensure that mandatory registration for Platform Providers aligns with broader NDIS provider registration reforms. While Platform Providers should be held to equivalent standards as traditional providers, the registration framework must account for the unique nature of platform-based service delivery to avoid unnecessary administrative burdens and maintain participant choice and flexibility.

Work in Co-Design with People with Disability and Representative Organisations

The success of this reform depends on genuine co-design with people with disability to ensure that the registration process strengthens safety and quality without restricting choice and autonomy. People with disability and representative organisations must be involved at every stage of policy design and implementation; with particular attention paid to those who represent multiply marginalised populations.

Recommendation 19: The NDIS Commission must engage in genuine co-design with people with disability and representative organisations at every stage of the policy design and implementation process. This should include prioritising input from multiply marginalised communities to ensure that registration requirements enhance safety and quality without restricting choice, autonomy, or access to supports.



PEOPLE WITH DISABILITY AUSTRALIA

People with Disability Australia (PWDA) is a national disability rights and advocacy organisation made up of, and led by, people with disability.

For individual advocacy support contact PWDA between 9 am and 5 pm (AEST/AEDT) Monday to Friday via phone (toll free) on **1800 843 929** or via email at pwd@pwd.org.au

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of our
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