



**PEOPLE WITH DISABILITY
AUSTRALIA**

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of our
own**

PWDA Response to the NDIS Quality and Safeguards
Commission Consultation Paper on Mandatory Registration for
Supported Independent Living (SIL) and Support Coordination.

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PWDA Response to the NDIS Commission Consultation on The Mandatory Registration of Supported Independent Living (SIL) and Support Coordination.

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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 Supported Independent Living (SIL) and Support Coordination 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 this consultation, PWDA has drawn on evidence from previous inquiries as well as insights from a recent survey conducted with PWDA members and the broader disability community. PWDA outlines key concerns from participants and providers regarding the potential negative impacts of mandatory registration, including over-regulation, market monopolisation, and the undermining of participant choice and control.

Over-regulation risks imposing unnecessary administrative and financial burdens, particularly on small, independent, and peer-led providers that already deliver high-quality, individualised supports. Market monopolisation is also a significant concern among the community, with issues being raised about how increased compliance costs and administrative burdens may push small and independent providers out of the market, leading to a concentration of services among large providers.

Additionally, mandatory registration may undermine participant choice and control, as many participants prefer to engage unregistered providers due to their flexibility, cultural safety, and responsiveness. The proposed changes could significantly limit the ability of participants to choose the supports that best meet their needs.

¹ NDIS Quality and Safeguards Commission (2024) *Consultation Paper: Mandatory Registration: Supported Independent Living (SIL) and Support Coordination*, Australian Government, Canberra.

PWDA believes there are several key solutions to address these concerns, including:

- A simple, low-cost registration process should be implemented to ensure that requirements are proportionate to provider capacity and the level of risk involved in service delivery
- Grace periods and transition support should be provided to allow providers adequate time to meet new requirements while continuing to deliver essential supports;
- Additional guidance, financial assistance, and administrative support should be made available to sole traders, microbusinesses, and grassroots organisations to help them navigate the registration process.

Moreover, rather than enforcing a blanket registration mandate, a targeted approach should be taken, requiring registration only where it is necessary to manage specific risks, such as in closed settings like group homes.

PWDA supports efforts to improve quality and safety for NDIS participants. However we feel strongly that, the design and implementation of additional registration needs to be approached and implemented in a manner that ensures any new measures do not create new barriers to access or diminish the rights of people with disability to exercise control over their own lives.

Summary of Recommendations

Recommendation 1: The NDIS Commission should ensure that mandatory registration requirements do not limit participant choice and control by maintaining pathways for self-managed participants and participants registered for self-directed registration to engage non-registered providers where appropriate.

Recommendation 2: Taking into account the different settings and circumstances in which supports are received, the NDIS Commission should implement a tiered approach to registration and compliance that aligns with the level of risk associated with each service type. This should include alternative compliance pathways for low-risk SIL and Support Coordination providers, such as a streamlined audit process or registration exemptions for small providers that meet specific quality criteria.

Recommendation 3: The NDIS Commission should prohibit any provider from delivering both SIL and Support Coordination to the same participant to ensure independent oversight and prevent conflicts of interest.

Recommendation 4: The NDIS Commission should implement stronger monitoring and enforcement mechanisms to prevent coercion and provider self-referrals within SIL and Support Coordination services and to support participants to be able to make fully informed decisions about their supports, free from manipulation or coercion. This should include clear, accessible and easy to navigate processes that support participants to make complaints where provider coercion or misconduct occurs.

Recommendation 5: The NDIS Commission should maintain participant choice and control by ensuring that self-managed participants can continue to access unregistered providers where appropriate, particularly in rural and remote areas and within culturally specific service models.

Recommendation 6: The NDIS Commission should actively collect data on and monitor the impact of mandatory registration on service diversity and take corrective action if it leads to reduced provider competition or increased service costs.

Recommendation 7: The NDIS Commission should consider exceptions or additional transition support for small, independent, and peer-led providers that may struggle with registration requirements due to limited administrative capacity, ensuring participants relying on these providers are not unintentionally disadvantaged.

Recommendation 8: If Mandatory registration is to go ahead for all SIL and Support Coordination providers, the Australian Government and / or NDIS Commission should provide financial assistance, administrative support, and clear guidance to sole traders, microbusinesses, and peer-led organisations to help them navigate the registration process and remain in the NDIS market.

Recommendation 9: The NDIS Commission should work with NDIS participants, their supporters and representative organisations to co-design communications that provide clear accessible information about the changes. The NDIS Commission should also provide and widely distribute a structured timeline detailing when changes will take effect and what actions are required from participants and providers. As part of these communications, the NDIS Commission should develop and distribute accessible, easy-to-understand information about registration changes in multiple formats, including Easy Read, Auslan, audio, and plain English.

Recommendation 10: The Australian Government, NDIA, and NDIS Commission should introduce a streamlined, low-cost registration option for sole traders and microbusinesses to reduce administrative and financial barriers while maintaining service quality and oversight.

Recommendation 11: The NDIS Commission should establish a grace period and provisional registration option to allow providers to continue service delivery while meeting new registration requirements, preventing service disruptions for participants. The Commission should also provide additional support and / or allow

exceptions to the proposed timeline for small, independent providers struggle to meet the registration deadlines, despite providing safe and quality supports to participants.

Recommendation 12: The NDIS Commission should create a publicly available, accessible, up to date and user-friendly directory of registered providers, including small, independent, and culturally specific providers, to support participant choice and service transparency.

Recommendation 13: The NDIS Commission should ensure that NDIS participants are **not** penalised for unintentionally accessing supports from unregistered services.

Recommendation 14: The NDIS Commission should ensure that mandatory registration aligns with broader NDIS reforms, particularly self-directed supports, to prevent conflicting policies that could restrict participant choice and control.

Recommendation 15: The NDIS Commission should prioritise co-design with the disability community at every stage of the reform process, ensuring that people with disability and their representative organisations, including First Nations communities, culturally and linguistically diverse (CALD) participants, and those in rural and remote areas, have a central role in shaping policy changes.

Background to Consultation

The provision of SIL and Support Coordination within the NDIS has been the subject of multiple inquiries and reviews, which have highlighted both critical safeguarding concerns and the need for improved service quality and oversight.² The current consultation on the mandatory registration of SIL and Support Coordination providers builds on findings from previous investigations, including the Own Motion Inquiry into Support Coordination and Plan Management, the Own Motion Inquiry into Aspects of Supported Accommodation, the NDIS Review, and the Royal Commission into Violence, Abuse, Neglect, and Exploitation of People with Disability.³ These inquiries found significant gaps in regulation, leading to inconsistent service quality and risks to participant safety, and conflicts of interest in both SIL and Support Coordination services.⁴

Support Coordination is intended to be an intermediary service that helps NDIS participants understand and implement their plans, connect with providers, and build their capacity to manage their own supports.⁵ However, the Own Motion Inquiry into Support Coordination and Plan Management found that numerous issues were impacting participants. A major concern was conflict of interest, where support coordinators who also provided other services influenced participants to use their own or affiliated services, sometimes coercing them into particular providers or discouraging them from changing providers.⁶ Other issues included providers leaving

² See e.g. NDIS Quality and Safeguards Commission (2023) *Own Motion Inquiry Into Support Coordination And Plan Management Part 1*, Australian Government, Canberra; NDIS Quality and Safeguards Commission (2023) *Inquiry Report: Own Motion Inquiry into Aspects of Supported Accommodation*, Australian Government, Canberra.

³ Ibid; 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; Australian Government (2025) 'Royal Commission into Violence Abuse, Neglect and Exploitation of People with Disability,' Commonwealth of Australia.

⁴ NDIS Quality and Safeguards Commission (2024) *Consultation Paper: Mandatory Registration: Supported Independent Living (SIL) and Support Coordination*, Australian Government, Canberra, p. 8.

⁵ National Disability Insurance Agency (2021) 'Support Coordination,' *National Disability Insurance Scheme* <<https://www.ndis.gov.au/participants/using-your-plan/who-can-help-start-your-plan/support-coordination#:~:text=Support%20coordination%20is%20a%20capacity,use%20and%20coordinate%20your%20support s>>.

⁶ NDIS Quality and Safeguards Commission (2023) *Own Motion Inquiry Into Support Coordination And Plan Management Part 1*, Australian Government, Canberra, p. 26.

participants without adequate support, over or underusing funds and denying participants choice and control by refusing to act on their preferences.⁷ Safety concerns were also identified through findings where workers and providers had breached privacy, committed acts of verbal abuse, and failed to adequately respond to complaints.⁸

The Own Motion Inquiry into Aspects of Supported Accommodation, which examined settings where SIL is commonly provided, identified similar concerns regarding poor provider practices, violence and abuse, and limited choice of providers.⁹ The inquiry found that, while participants theoretically have the right to choose their SIL provider, in practice, this choice is often restricted, particularly in shared living environments where multiple participants rely on shared supports.¹⁰ The inquiry also documented instances of abuse and neglect, including verbal and physical abuse, emotional coercion, rough handling, controlling behaviour and failure to provide or correctly administer medications.¹¹ Further, staffing issues and procedural failures were found to contribute to service gaps, such as workers leaving shifts early, neglecting hygiene needs, or creating unsafe conditions by failing to provide gender-appropriate support.¹² While this inquiry did not specifically recommend mandatory registration, it did call for increased monitoring and oversight, including strengthening the NDIS Practice Standards¹³ - which currently apply only to registered providers.

Following on from these inquiries and after conducting its own extensive consultations, the NDIS Review recommended in 2023 that all providers of NDIS supports be registered.¹⁴ In response to significant community opposition to this recommendation, stemming from concerns about how the proposed changes could limit participant choice, reduce the availability of diverse and specialised services,

⁷ Ibid, pp. 24-26.

⁸ Ibid, pp. 43.

⁹ NDIS Quality and Safeguards Commission (2023) *Inquiry Report: Own Motion Inquiry into Aspects of Supported Accommodation*, Australian Government, Canberra, pp. 23, 46.

¹⁰ Ibid, p. 23.

¹¹ Ibid, pp. 46-47, 51.

¹² Ibid, pp. 52-52.

¹³ Ibid, p. 53.

¹⁴ NDIS Review (2023) *Working together to deliver the NDIS. Independent Review into the National Disability Insurance Scheme Final Report*, Commonwealth of Australia, p. 215.

government established the NDIS Provider and Worker Registration Taskforce (hereinafter referred to as the 'NDIS Registration Taskforce') in 2024 to give further consideration to this recommendation and to advise on an appropriate registration model for NDIS providers.¹⁵

In consultation with the disability community and other stakeholders, the Taskforce proposed a graduated risk-proportionate registration model with four registration categories.¹⁶ Under this framework, SIL providers would be required to obtain 'Advanced Registration,' recognising the high-risk nature of these services.¹⁷ The Taskforce recommended that all SIL and Home and Living providers be registered as a matter of urgency within 12 months.¹⁸

The Taskforce also recommended mandatory registration for Support Coordination. However, specific references were only made in regards to Level 3 - 'Specialist Support Coordination' being 'high-risk,' with limited attention giving to any safety and quality issues associated with 'Level 1- Support Connection' and 'Level 2 – Coordination of Supports.'¹⁹

Drawing on previous inquiries and the Taskforce advice, on 16 September 2024, the Minister for Government Services and the NDIS, the Hon Bill Shorten MP, announced the government's commitment to mandatory registration for all SIL and Support Coordination providers, with implementation proposed no earlier than 1 July 2025.²⁰ The current consultation²¹ seeks feedback on the potential impacts of these changes, the effectiveness of proposed transition arrangements, and what support may be needed to assist participants and providers in adapting to the new requirements.

¹⁵ 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. 17.

¹⁶ *Ibid.*, p. 17.

¹⁷ *Ibid.*, p. 44. SIL

¹⁸ *Ibid.*

¹⁹ National Disability Insurance Agency (2021) 'Support coordination,' *National Disability Insurance Scheme*, viewed 03 March 2025 < <https://www.ndis.gov.au/participants/using-your-plan/who-can-help-start-your-plan/support-coordination>>.

²⁰ NDIS Quality and Safeguards Commission (2024) *Consultation Paper: Mandatory Registration: Supported Independent Living (SIL) and Support Coordination*, Australian Government, Canberra, p. 8.

²¹ *Ibid.*

PWDA Survey

In January 2025, PWDA launched a survey²² to gain feedback from its members and the broader disability community on the mandatory registration of platform providers, SIL and Support Coordination. Relevant to this consultation, the survey asked questions about how many respondents had used SIL and Support Coordination, whether the providers they had used were registered, any benefits or issues they had experienced through accessing SIL and Support Coordination, 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 participants. Among these respondents, 15% said that they or the person that they care for had used SIL and 49% said that they had accessed Support Coordination.

Notably, a large proportion (32%) of respondents indicated that they lived in rural, regional and / or remote locations and a significant number said that they were Aboriginal or Torres Strait Islander (9%), likely highlighting the significant impact that mandatory registration could have on these communities.

Support Coordination

Among those who had received Support Coordination, many (72%) indicated that they were allocated Levels 1 or 2, covering Support Connection or Coordination of Supports. A few responses (14%) indicated a lack of clarity on their specific allocation.

²² People With Disability Australia (2025) 'Member Survey on Mandatory Registration,' *People With Disability Australia*, Viewed 20 February 2025 <<https://pwd.org.au/member-survey-on-mandatory-registration/>>.

In response to a question about whether the support coordinator or their company was registered with the NDIS, a large number of respondents (58%) said that the coordinator or company they had used was already registered, while 22% said that the coordinator or company they used was not registered.

Respondents generally found Support Coordination beneficial. Positive comments included the ability to better manage supports and improve outcomes. Some participants shared that without Support Coordination, managing NDIS services would be overwhelming.

"I wouldn't be able to manage without support coordination."

"I am a plan nominate for family member and I have found that with my own fluctuating health and the circumstances of this family member, support coordination has been instrumental in helping to navigate things and deal with challenges when they arise and even just monitor and keep track."

"My support coordinator is like gold. She gets me and my disability. She helps me get the most out of what little funding I get."

"Very beneficial when you've got a complex disability and there's lots of different stakeholders to interface with."

However, a minority of respondents indicated they found little benefit, citing that self-managed Support Coordination arrangements had been more beneficial.

"I found my own support workers without needing a coordinator."

"Mixed - some specialist support coordinators are utterly useless."

Respondents were divided on how mandatory registration would impact NDIS participants. Some believed it would ensure coordinators meet higher standards and improve service delivery. Others were concerned it would limit options and exclude experienced but non-registered providers from being able to provide NDIS services. Overall, the sentiment seemed to be that registration alone was not sufficient to increase quality and safety of supports and that this would require additional measures such as regular monitoring and auditing.

SIL

Among respondents to the survey who had used SIL supports, 34% said their provider was registered, 40% said that they were not registered and 10% said that they were not sure.

Responses were mixed on whether SIL had been beneficial, with some saying that it had been life changing for them or the person they support and others outlining significant issues that they had experienced or witnessed, such as providers acting disrespectful or neglecting basic daily needs of participants.

“...very positive and beneficial. If I didn’t have this help I would either be in hospital or a nursing home.”

“SIL support is life sustaining for my son who has intensive, complex disabilities and associated disability related health supports.”

“it has been amazing. To not have the opportunity to utilize SIL moving forward would not enable me to have short term respites.”

“Some have been extremely helpful and others have been less helpful.”

“I have had support workers who were not trained properly and made my situation worse.”

my living situation worse. We need better standards and enforcement.”

“One company I am aware of was responsible for malnourishing and non-treatment of daily basic needs of an adult with severe NDIS requirements.”

“Noy yet, Not really. To this day...services provided are dismissfull, disrespectful and undemide those with needs...such as pretende to do tasks and misleading. [SIC]”

In regards to mandatory registration, a large number of respondents to the survey said they believed that mandatory registration of SIL was a necessary step to improve the safety and quality of services for participants and many said that it would make them feel safer and more confident to access SIL supports.

“I think mandatory registration for supported independent living makes sense. There are problems with the whole SIL model and they does need to be greater scrutiny.”

“It will make participants feel more at ease knowing that SIL providers are registered with the NDIS and adhering to there [SIC] standards.”

“Participants will have more confidence that the SIL provider will have the necessary expertise to meet their needs.”

However, some respondents said that they did not believe mandatory registration alone would improve safety and quality and that doing this would require additional measures such as auditing and training, as well as support for providers and workers. Additionally, respondents raised concern that mandatory registration would

likely decrease choice over providers and increase the cost of services due to added administrative burden.

“Prices will go up. Some providers just won't bother and we'll be left with less choice. It depends on the risk to each individual participant not on some stupid government rule.”

“It will in all likelihood ... increase the cost for care but still not weed out the problems... the companies... care more about getting paid than ... providing appropriate care...”

“Unless registration is also ...[linked]... to improved skills and service delivery it will become just a costly administrative burden that could divert necessary funds from training and support.’

“I fear unintended consequences by further limiting my access to regional/rurally based workers who won't put the time or money into registering.”

Response to Consultation Questions

Do you think the proposed mandatory registration changes for SIL and Support Coordination will impact the ways participants access and receive these supports?

While PWDA supports efforts to improve safety, quality, and oversight within the NDIS, we emphasise that these measures must be balanced with maintaining choice and control, a fundamental principle of the NDIS.²³ As they stand, the proposed mandatory registration changes for SIL and Support Coordination could unintentionally limit participants' ability to access flexible, person-centred supports and reduce the diversity of providers available—particularly in regional, rural, and remote areas.

Context

The NDIS Commission is proposing mandatory registration changes for both SIL and Support Coordination providers to improve oversight and service quality. Currently, SIL falls under Registration Group 0115, which includes other home and living supports such as Short-Term Accommodation (STA), Medium-Term Accommodation (MTA), and Individualised Living Options (ILO). The proposed change would create a separate category within this group, *called* 'Assistance with Supported Independent Living,' making registration mandatory for all SIL providers.²⁴

For Support Coordination, services are currently divided between two registration groups: Registration Group 0106 (for Level 1 Support Connection and Level 2 Support Coordination) and Registration Group 0132 (for Level 3 Specialist Support

²³ NDIS Review (2023) 'The role, objectives and principles of the Framework,' *Commonwealth of Australia*, Viewed 20 February 2025
<<https://www.ndisreview.gov.au/resources/paper/ndis-quality-and-safeguarding-framework-issues-paper/key-issues/role-objectives-and>>.

²⁴ NDIS Quality and Safeguards Commission (2024) *Consultation Paper: Mandatory Registration: Supported Independent Living (SIL) and Support Coordination*, Australian Government, Canberra, pp. 11-13.

Coordination). The Commission proposes consolidating all Support Coordination services under Registration Group 0132 and making registration mandatory for all levels. Under this proposal, all support coordinators would need to complete a certification audit against the Core Module, with additional requirements for those delivering Level 3 services.²⁵

Participant Choice and Control Must be Maintained

While PWDA recognises that multiple past inquiries have shown that it is essential to improve monitoring to ensure the safety of participants,²⁶ PWDA is concerned that the proposed changes may, unintentionally, overly restrict choice and control for participants and undermine the principle of using self-management and self-directed support arrangements. Through multiple consultations including the survey done to inform this submission, PWDA has heard that many participants actively choose to engage small, independent providers or peer-led services, regardless of registration status, because they offer personalised, culturally appropriate, and community-driven support.

“The unregistered provider we had was far more flexible and delivered supports from our perspective.”

“I have some experienced support workers who have informal or 'on the job' training and it's far better with someone with a Cert Iv or similar who has no lived experience or experience with ... disability. I'd prefer to see someone has ... lived experience.”

“I rely on an independent coordinator who understands my needs. If registration limits my options, that's a problem.”

The risk with imposing mandatory registration across the board is that it could exclude many of these smaller providers, not because of service quality concerns,

²⁵ Ibid.

²⁶ Ibid, p. 6.

but due to the financial and administrative burden of the registration process. NDIS registration requires providers to complete certification audits, compliance checks, and administrative tasks,²⁷ which can be disproportionately difficult and financially burdensome for sole traders and microbusinesses. Unlike larger organisations that have dedicated compliance teams, smaller providers may struggle to navigate these requirements on their own and as a result, exit the sector altogether. This could significantly reduce the availability of diverse, person-centred services, particularly in regional and rural areas, where smaller providers often fill critical gaps in the market.²⁸

Recommendation 1: The NDIS Commission should ensure that mandatory registration requirements do not limit participant choice and control by maintaining pathways for self-managed participants and participants registered for self-directed registration to engage non-registered providers where appropriate.

Not all SIL and Support Coordination is the Same

Additionally, the shift to mandatory registration for all levels of Support Coordination and all types of SIL, regardless of the setting in which it is provided, risks over regulation and may create barriers to accessing appropriate supports for participants who require or use level 1 Support Connection, Level 2 Support Coordination or community based SIL.

While past inquiries, such as the Own Motion Inquiries into Supported Accommodation and Support Coordination, have highlighted significant quality and safety concerns, many of the most serious breaches of provider responsibilities occurred in closed settings, such as group homes (Supported Accommodation) and often by providers that were already NDIS registered.²⁹

²⁷ NDIS Quality and Safeguards Commission (2025) 'About Registration,' *Australian Government*, Viewed 20 February 2025 <<https://www.ndiscommission.gov.au/provider-registration/about-registration>>.

²⁸ 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.

²⁹ NDIS Quality and Safeguards Commission (2024) *Consultation Paper: Mandatory Registration: Supported Independent Living (SIL) and Support Coordination*, Australian Government, Canberra, p. 8.

In group homes, people with disability often experience reduced choice and control due to the shared nature of their supports and living environment,³⁰ which can create isolation and higher risks of abuse and neglect. In multiple instances, inquiries have found that residents in group homes were receiving SIL, accommodation, and Support Coordination services from the same provider.³¹ The reasoning for this was largely because it was convenient, however in practice, it was because residents had little to no ability to change providers without also disrupting their housing and daily supports and as a result, had no external oversight over the supports in their household.

On the basis of these findings, the NDIS Registration Taskforce categorised SIL supports as “high-risk” supports and recommended that all SIL and home and living providers be subject to mandatory registration under an ‘Advanced Registration’ category. However, these recommendations were largely based on evidence from group home settings, where institutional-style service models and power imbalances create greater risks for participants. They did not sufficiently account for the fact that there are SIL arrangements which exist outside of group homes, supporting people with disability to live independently in the community with tailored, flexible support models. As was noted in the NDIS Registration Taskforce advice report, community-based support arrangements often provide a higher degree of participant autonomy and involve natural safeguards, such as greater engagement with family, friends, and informal support networks.³² Treating all SIL providers the same, regardless of the setting in which the supports are being provided, fails to acknowledge these fundamental differences and could lead to unnecessary regulatory burdens for providers who are already delivering high-quality, low-risk services.

A similar concern applies to Support Coordination, particularly the proposed consolidation of Level 1 Support Connection and Level 2 Support Coordination

³⁰ 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. 50.

³¹ NDIS Quality and Safeguards Commission (2023) *Inquiry Report: Own Motion Inquiry into Aspects of Supported Accommodation*, Australian Government, Canberra, p. 38.

³² 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. 30.

services under the same mandatory registration requirements as Level 3 (Specialist Support Coordination). While the NDIS Registration Taskforce identified Level 3 as a “high-risk” support requiring Advanced Registration,³³ it did not provide specific advice on the registration of Level 1 or 2 Support Coordination.

Noting that many participants who use Level 1 or Level 2 services require only light-touch, non-complex assistance in navigating their NDIS plans, it must be recognised that forcing all Support Coordination providers to meet the same compliance and audit standards as those delivering specialist, high-risk Support Coordination could lead to reduced availability of Level 1 and 2 Support Coordination supports. In practice, this means that participants who do not require intensive Specialist Support Coordination may struggle to find affordable, accessible providers.

Recommendation 2: Taking into account the different settings and circumstances in which supports are received, NDIS Commission should implement a tiered approach to registration and compliance that aligns with the level of risk associated with each service type. This should include alternative compliance pathways for low-risk SIL and Support Coordination providers, such as a streamlined audit process or registration exemptions for small providers that meet specific quality criteria.

Failure to Address Conflicts of Interest

Despite its aim to improve safeguards and oversight, the proposed mandatory registration changes fail to address the issue of providers delivering multiple services to the same participant. As outlined earlier, multiple reports, including the Own Motion Inquiry into Support Coordination,³⁴ have highlighted that when a single provider delivers SIL, accommodation and Support Coordination to the same participant, there is inherent risk to participants, especially if they are left alone with individual workers and / or the participants’ natural safeguards are limited.

³³ Ibid, p. 33.

³⁴ NDIS Quality and Safeguards Commission (2023) *Inquiry Report: Own Motion Inquiry into Aspects of Supported Accommodation*, Australian Government, Canberra, p. 38.

“It concerns me to hear about SIL being provided by the same organisation that is providing accommodation. SIL and Accommodation provision need to be independent of each other.”

“PLEASE bring in a minimum ratio of 2 staff overnight, regardless of the customer numbers. The lack of supervision is allowing abuse, especially of those with complex communication needs, to be unchecked.”

Participants in these arrangements often lose their ability to make independent choices about their supports because their Support Coordinator, who should be helping them navigate their options, has a vested interest in ensuring that the participants access supports from the business from which they receive a pay check. This creates a power imbalance, making it difficult for participants to raise concerns, switch providers, or seek alternative services without significant disruption to their living situation.

“Once you are in SIL, you don’t have much control over what happens in your own home. That has to change.”

“The ability to choose my own workers and set up my own supports is critical. I don’t want to lose that flexibility.”

Rather than introducing broad mandatory registration requirements for all SIL and Support Coordination providers, reforms should focus on breaking up individuals’ supports across multiple providers and ensuring that individuals have choice and control over their supports and the workers that come into their homes.

“I think there needs to be greater support for residents in group home under SIL particularly for understanding and utilising choice and control.”

The current proposal does not introduce any new requirements to prevent providers from delivering both SIL and Support Coordination to the same participant, nor does it provide stronger enforcement mechanisms to address providers who exert undue influence over participants' choices.

Recommendation 3: The NDIS Commission should prohibit any provider from delivering both SIL and Support Coordination to the same participant to ensure independent oversight and prevent conflicts of interest.

Recommendation 4: The NDIS Commission should implement stronger monitoring and enforcement mechanisms to prevent coercion and provider self-referrals within SIL and Support Coordination services and to support participants to be able to make fully informed decisions about their supports, free from manipulation or coercion. This should include clear, accessible and easy to navigate processes that support participants to make complaints where provider coercion or misconduct occurs.

Risk of Market Monopolisation

Findings from PWDA's recent survey indicate that many participants and providers are deeply concerned about the risk of market monopolisation under the proposed mandatory registration changes. As outlined earlier, imposing higher administrative and financial barriers, through mandatory registration, could disproportionately impact small providers, sole traders, and microbusinesses, many of whom already operate on tight margins and lack the resources to navigate the complexity of the NDIS bureaucracy. If smaller providers are pushed out of the market, participants may be left with fewer choices, particularly in regional and rural areas.

“It is not good. It will take away choice and control and I will not be able to have my independant [SIC] sole trader SW's and prices will raise and give rural and remote people less workers to work with, as they are all leaving the industry if they are required to register.”

“We will lose all independents and it will NOT BE GOOD IN RURAL AND REMOTE areas as there will be NO STAFF to help us and we will be worse off with nil services to help us navigate NDIS supports!”

Without stronger protections against market concentration, the proposed changes risk entrenching the dominance of large providers, weakening the principle of choice and control and likely increasing prices issued by providers who have little to no viable competition.

“I think less people will do the job due to the expense and extra paperwork and jumping through hoops. This will give participants less choice.”

“I think it will limit choice and control for participants. And allow larger, less actually person-centred providers to further monopolise.”

Recommendation 5: The NDIS Commission should maintain participant choice and control by ensuring that self-managed participants can continue to access unregistered providers where appropriate, particularly in rural and remote areas and within culturally specific service models.

Recommendation 6: The NDIS Commission should actively collect data on and monitor the impact of mandatory registration on service diversity and take corrective action if it leads to reduced provider competition or increased service costs.

Transition process must 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 provider registration or compliance requirements. Many participants rely on SIL supports and Support Coordination services to coordinate and provide essential daily support and

personal care supports;³⁵ meaning that any gaps in service delivery could have serious consequences for their safety, wellbeing and independence.

“There must be continuity of services and supports for people currently receiving services from unregistered [SIC] SIL providers as we transition to a mandatory registration environment. Provisional SIL registration to enable continued service delivery is essential to ensure PWD continue to receive the necessary support to remain in their own home. I am concerned about preventable hospital admissions, social admission, housing security issues and increased stress and anxiety among all participants, their families and carers.”

Do you think the proposed transition arrangements will help manage these impacts?

Context

In the consultation paper,³⁶ the NDIS Commission has outlined a transition process for providers affected by the mandatory registration changes. Providers fall into three main groups, each with different requirements and timelines for compliance.

Under the proposed changes, unregistered providers must submit a registration application within three months of the implementation date and complete a full certification audit against the Core Module within 12 months. During this period, they can continue delivering supports while their registration is being processed. Providers offering Level 3 Support Coordination will also need to meet additional assessment requirements under the Specialist Support Coordination module.

For registered providers who are not currently registered for SIL or Support Coordination, the consultation paper states that they will be able to apply to vary

³⁵ Ibid, pp. 7, 8, 15.

³⁶ NDIS Quality and Safeguards Commission (2024) *Consultation Paper: Mandatory Registration: Supported Independent Living (SIL) and Support Coordination*, Australian Government, Canberra, pp. 11-13.

their registration to include these services.³⁷ They will be assessed against the Core Module, and those intending to deliver Level 3 services must also meet the requirements of the Specialist Support Coordination module.³⁸

Currently registered providers will also experience changes. For those already registered under Registration Group 0132 for Specialist Support Coordination, no action is required, but their registration will now become mandatory. Providers registered under Registration Group 0106, which includes Level 1 and 2 Support Coordination, will be transferred to Group 0132, making registration mandatory. Some providers may need to meet additional requirements if they intend to deliver Level 3 services.

Continuity of Supports

The proposed arrangements include ‘transition’³⁹ measures that aim to maintain continuity of supports, which is a welcome approach. Allowing unregistered providers to continue delivering supports while they undergo the registration process ensures that participants relying on these services will not face sudden disruptions. However, it is important to recognise that some small, independent providers - particularly those with limited administrative resources - may struggle to complete the registration process within the required timeframes.

“...not possible for our autistic run organisation to become registered as its not a for pofit org [SIC] and peer driven nature is inconsistent with assumptions all providers are for profit , ABN.ONERUS REQUIREMENTS INCLUDING REPORTING CANNOT BE MET BY EVERY AUTISTIC PEER DOING THE SUPPORTING AS NOT A STRAIGHT CASE OF PROFESSIONAL SUPPORT BUT COMMUNITY BASED , AUTISTIC CULTURAL DRIVEN. GOODWILL , MENTORING ON A RECIPROCAL BASIS. ELDERS ETC.”

³⁷ Ibid.

³⁸ Ibid.

³⁹ Ibid.

In such cases, exceptions or additional transition support should be considered, ensuring that participants who rely on these providers are not unintentionally disadvantaged.

Tiered Approach to Registration

The introduction of a tiered approach to registration is also a positive step, as it acknowledges different levels of risk associated with different services. However, despite these efforts, there are ongoing concerns about choice and control for participants. A major impact of these changes is that participants will no longer be able to use unregistered providers, which could significantly reduce their available options. This is particularly problematic in First Nations communities, rural and remote areas, and among participants with invisible or complex disabilities, whose needs may not be well met by large traditional providers. These participants often rely on peer-led services, small providers, or sole traders who offer highly flexible and individualised support models, but may not have the capacity to meet the administrative and financial demands of registration.

“While the move aims to improve quality, accountability, and safeguards, it may also reduce participant choice, increase service costs, and create workforce gaps—especially in rural and remote areas. Many skilled independent coordinators may leave the sector due to administrative burdens, potentially leading to longer wait times and less flexibility for participants.”

Without additional flexibility or alternative pathways for these providers to remain in the market, the transition arrangements may unintentionally restrict access to the very services that participants rely on for personalised and effective support.

Recommendation 7: The NDIS Commission should consider exceptions or additional transition support for small, independent, and peer-led providers that may struggle with registration requirements due to limited administrative and financial

capacity, ensuring participants relying on these providers are not unintentionally disadvantaged.

Market Monopolisation and Conflicts of Interest

Additionally, the transition arrangements do not address broader concerns about market monopolisation and conflicts of interest. By making registration mandatory across all SIL and Support Coordination providers, there is a risk of further consolidating market power among large, multi-service organisations. These organisations already dominate the sector⁴⁰ and often provide both accommodation and Support Coordination,⁴¹ which can create significant conflicts of interest in circumstances, where for example, a Support Coordinator is linking the participant with SIL supports. With the implementation of mandatory registration, there is risk that the ability of participants to access supports from multiple different providers may be further limited, thereby increasing the likelihood of these conflicts existing and further limiting independent oversight of service provision.

‘It will just squeeze out small providers. And the lack of competition will cause quality of service to worsen.’

“It could result in a monopoly of particular organisations in the sector. And it may result in even more registered providers who do cause harm to disabled people, getting away with it, because they are registered.”

While the transition process is designed to minimise immediate disruptions, the long-term risks of reduced service diversity, provider consolidation, and weakened participant choice must be carefully managed. Stronger safeguards are needed to support smaller providers, prevent market monopolisation, and ensure that participants retain genuine choice and control over the supports they access.

⁴⁰ NDIS Quality and Safeguards Commission (2023) *Inquiry Report: Own Motion Inquiry into Aspects of Supported Accommodation*, Australian Government, Canberra, p. 89.

⁴¹ *Ibid*, p. 38.

Recommendation 8: If Mandatory registration is to go ahead for all SIL and Support Coordination providers, the Australian Government and / or NDIS Commission should provide financial assistance, administrative support, and clear guidance to sole traders, microbusinesses, and peer-led organisations to help them navigate the registration process and remain in the NDIS market.

What support or information would help people prepare for these changes?

For participants and providers to effectively prepare for the proposed registration changes, clear, accessible, and widely distributed information is essential. The PWDA survey highlighted significant concerns about uncertainty and lack of guidance.

"Any information, the uncertainty is causing too many issues."

"Some direct education rather than just the ndis website would be a good start. It can be hard to find all the information you need."

To address this, the NDIS Commission should co-design a communications strategy with NDIS participants, their supporters and representative organisations to provide clear accessible information to people with disability and providers. The Commission should also provide and widely distribute a structured timeline detailing when changes will take effect and what actions are required from both participants and providers.

Accessible and Transparent Communication

In order to make sure that the information distributed is accessible to NDIS participants, in all of their diversity, information should be provided in multiple accessible formats such as in plain English, Easy Read, Auslan, and multiple languages, as well as in visual and audio-based formats to cater for different styles

of processing information. In the PWDA, survey, this was strongly emphasised, with many participants highlighting difficulty in finding relevant and accessible information.

"Plain English statements, videos, visual diagrams."

Recommendation 9: The NDIS Commission should work with NDIS participants, their supporters and representative organisations to co-design communications that provide clear accessible information about the changes. The NDIS Commission should also provide and widely distribute a structured timeline detailing when changes will take effect and what actions are required from participants and providers. As part of these communications, the NDIS Commission should develop and distribute accessible, easy-to-understand information about registration changes in multiple formats, including Easy Read, Auslan, audio, and plain English.

A Simple, Low-Cost Registration Process

A key concern raised in the PWDA survey is that many small providers and sole traders may struggle with the financial and administrative burden of registration.

"Registration costs/requirements need to be lowered so that they are feasible for an individual/sole trader to actually do. The current registration process will force many good support coordinators out of business/out of the industry."

To address this, the NDIS should lower registration costs and simplify processes, particularly for peer-led, community-based, and culturally specific providers. Clear "how-to" guides, cost breakdowns, and directories of auditors should be made available to assist small providers in navigating the registration process.

"A directory of auditors. Particularly resources on how sole traders can sign up for PRODA without needing organisation sponsorship."

Recommendation 10: The Australian Government, NDIA, and NDIS Commission should introduce a streamlined, low-cost registration option for sole traders and microbusinesses to reduce administrative and financial barriers while maintaining service quality and oversight.

A Grace Period

Noting that it is essential that people with disability are supported to continue receiving supports while their chosen providers complete the registration process, PWDA supports the proposal in the consultation paper to allow providers a transition period,⁴² giving them time to register, while still providing supports to participants.

"Clear guidelines & process/timeline. A grace period, where clients can keep current supports, while they complete the registration."

However, it is important that the NDIS Commission also acknowledges circumstances where some small, independent providers may struggle to meet the registration deadlines, despite providing safe and quality supports to participants.

In such cases, additional transition support or exceptions should be considered to prevent participants from being unintentionally disadvantaged.

Recommendation 11: The NDIS Commission should establish a grace period and provisional registration option to allow providers to continue service delivery while meeting new registration requirements, preventing service disruptions for participants. The Commission should also provide additional support and / or allow exceptions to the proposed timeline for small, independent providers struggle to meet the registration deadlines, despite providing safe and quality supports to participants.

⁴² NDIS Quality and Safeguards Commission (2024) *Consultation Paper: Mandatory Registration: Supported Independent Living (SIL) and Support Coordination*, Australian Government, Canberra, pp. 11-13.

Supporting Participants Through the Transition

Many participants currently use unregistered support coordinators and SIL providers due to their flexibility, person-centred approach, and cultural alignment. To ensure continuity of care, the NDIS should notify participants whose Support Coordinators are unregistered and provide clear guidance on how to find and transition to registered providers if necessary.

In response to the PWDA survey, participants expressed concern that their provider may not register in time and that this would have negative consequences for them as participants.

“What happens if my support coordinator doesn’t get registered in time? Will I be left without support?”

“How to tell if they’re registered.”

To address, this, participants need a simple way to check whether their current providers are registered and assurance that they are not penalised for unintentionally accessing supports from unregistered services.

Recommendation 12: The NDIS Commission should create a publicly available, accessible, up to date and user-friendly directory of registered providers, including small, independent, and culturally specific providers, to support participant choice and service transparency.

Recommendation 13: The NDIS Commission should ensure that NDIS participants are **not** penalised for unintentionally accessing supports from unregistered services.

Moving Forward and Conclusion

Moving forward, it is crucial that any changes to the registration of SIL and Support Coordination align with broader NDIS reforms, particularly those designed to strengthen self-directed supports. Currently, there is a clear inconsistency between the proposal for mandatory provider registration and the approach to self-directed supports. Under the proposed framework, Self-Directed NDIS participants would be allowed to continue accessing unregistered providers, provided they register with the NDIS Commission as a Self-Directed participant.⁴³ However, the proposed mandatory registration model would require all SIL and Support Coordination providers to be registered, effectively limiting participants' ability to choose their own providers. This directly contradicts the core principles of self-directed support, which prioritise choice, flexibility, and person-centred service delivery. To uphold these principles, it is essential that mandatory registration does not create unintended barriers that restrict participant autonomy or limit access to diverse and specialised providers.

To achieve a fair and effective implementation, co-design with the disability community must be prioritised at every stage of the reform process, including in design of communications with NDIS participants and the broader community. In this co-design, particular attention should be given to working with people with disability and representative organisations who understand the needs of marginalised groups. This includes First Nations communities, culturally and linguistically diverse (CALD) participants, people in rural and remote areas, and those with complex or invisible disabilities, who often face additional challenges in accessing appropriate and culturally safe supports. Without genuine co-design, the reforms risk reinforcing existing inequities, increasing safety risks and creating further barriers to accessing essential supports.

⁴³ Department of Social Services (2024) '[Consultation on Self Directed Supports Registration](https://engage.dss.gov.au/selfdirect/),' Australian Government, Department of Social Services. Viewed 21 January 2025 < <https://engage.dss.gov.au/selfdirect/>>.

Recommendation 14: The NDIS Commission should ensure that mandatory registration aligns with broader NDIS reforms, particularly self-directed supports, to prevent conflicting policies that could restrict participant choice and control.

Recommendation 15: The NDIS Commission should prioritise co-design with the disability community at every stage of the reform process, ensuring that people with disability and their representative organisations, including First Nations communities, culturally and linguistically diverse (CALD) participants, and those in rural and remote areas, have a central role in shaping policy changes.



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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**A voice
of our
own**