



**NDIS Quality
and Safeguards
Commission**

Mandatory Registration of Platform Providers

What we heard

July 2025



Acknowledgement of Country

The NDIS Quality and Safeguards Commission acknowledges the traditional custodians of the land on which we live and work. We pay our respects to their Elders past, present and emerging as well as any First Nations People reading this paper.

It is our hope that as Australians we can work together to make a meaningful difference for a more inclusive and respectful society for all.

Artwork by Presten Warren

Contents

Executive Summary.....	4
Glossary.....	6
Background	7
Consultation approach.....	8
What we heard	10
Next steps	Error! Bookmark not defined.
Appendix A – Consultation topics	24
Appendix B – Analysis approach	25

Executive Summary

This report is prepared by the NDIS Quality and Safeguards Commission (NDIS Commission). The NDIS Commission upholds the rights of NDIS participants and oversees provider quality.

In this report, the NDIS Commission shares what we heard from people across Australia during consultations on proposed mandatory registration reforms. This report focuses on mandatory registration of Platform Providers.

This report explains why we need the changes, what they aim to do, and how we're planning to introduce them.

About Platform Providers

Platform Providers are NDIS providers that use profile-based platforms to connect participants with workers to deliver NDIS supports, for example an app or website where NDIS participants and workers create a 'profile'.

In 2023, we looked closely at how Platform Providers work through an [Own Motion Inquiry into how Platform Providers operate in the NDIS market](#) (the Inquiry). During the Inquiry we spoke to participants who use Platform Providers. We heard that these platforms can give participants more choice and control. But we also found that more needs to be done to keep people safe and improve the quality of these services.

Platform Providers will be required to register under the current registration model. We released a [consultation paper](#) on this topic in November 2024.

What we wanted to know about

How to define Platform Providers

We looked at other laws and research on digital platforms to help us come up with a definition. We shared our early thinking, which was to define platforms by their common features and only focus on those who deliver NDIS services. We also asked whether we should have the power to decide if a business is a Platform Provider.

Registration of Platform Providers

We asked participants, workers, and providers how registration could help us make sure Platform Providers are offering safe, reliable, and high-quality services, while continuing to support participant choice and innovation.

Who we heard from

We heard from a range of people, including:

- participants and their supporters
- workers
- providers
- peak bodies
- other Government agencies.

We received a total of:

- **299 survey responses** (60 participants and their supporters, 137 workers, 72 providers and 30 from others)
- **68 submissions** (26 submissions in response to our consultation paper published in November 2024)

We also held a Platform Provider consultative forum with 18 Platform Providers and other Government agencies to talk about the ideas we heard in the survey and submissions.

What we heard

- Platform Providers are popular because they offer choice and flexibility.
- People want better safeguards to make sure services from these platforms are safe and good quality. They also believe that Platform Providers have a key role in making sure this happens.
- Some people were worried that registration could reduce choice for participants.
- Others said it could help make sure more safe, high-quality supports are available and sustainable.
- Most people agreed with our idea to define Platform Providers based on their shared features.
- They said the definition should be simple and work well with other systems, like Aged Care.
- People also said that registration rules should be similar to those for other providers and focus on improving quality and safety.
- A smooth transition with clear information and timeframes will be important to implementing mandatory registration of Platform Providers.

Next Steps

The feedback we received will help us create a clear definition of Platform Providers and design how registration will work.

We will keep talking to participants and other stakeholders as we plan these changes. Before any legislation is introduced, we will publish a draft that explains the changes and the timeline.

Glossary

Application Programming Interface (API): A tool that lets different computer systems talk to each other and share information. In this paper, it means platform software sending incident reports or complaints to the NDIS Commission system.

Current registration model: The current requirements and rules for NDIS providers to register with the NDIS Commission.

Choice and control: A participant has the right to make their own decisions about what is important to them and to decide how they would like to receive their supports and who from.

Designating an organisation: When the Government makes a law, they can name specific organisations that the law will apply to.

NDIS (National Disability Insurance Scheme): A national program that supports people with disability. It's run by the National Disability Insurance Agency (NDIA).

Mandatory registration: The requirement for NDIS providers to be registered with the NDIS Commission to deliver identified classes of supports. We are consulting on how to apply this requirement to three additional classes of support: Platform Providers, Supported Independent Living (SIL) and Support Coordination.

Market (NDIS Market): A collection of providers offering products and services to participants.

Platform Provider: An NDIS provider that uses a profile-based platform (for example an app or website where NDIS Participants and workers create a "profile") to connect NDIS participants with workers to deliver NDIS supports. Platform Providers may be registered or unregistered NDIS providers.

Participants (NDIS participants): People who apply and meet the eligibility criteria for the NDIS.

Supporter of an NDIS participant: A carer, guardian or family member of an NDIS Participant.

Worker: An individual who delivers NDIS funded supports or services to an NDIS Participant. A worker may be a NDIS provider or employed or engaged by a NDIS provider (registered or unregistered).

Background

On 16 September 2024, the then Minister for Government Services and the NDIS, the Hon Bill Shorten, announced that Platform Providers, Support Coordinators, and Supported Independent Living (SIL) providers would need to register with the NDIS Quality and Safeguards Commission (NDIS Commission). This decision was made to improve the quality and safety of services provided to NDIS participants.

Why the reforms are needed

Several major reviews have shown serious issues in the way NDIS services are being delivered, including risks to participants' safety and quality of care. These reviews include:

- The [Disability Royal Commission](#) found serious cases of abuse and neglect within the NDIS scheme and called for stronger regulation, especially in services involving personal care, accommodation, and Support Coordination.
- The [2023 Independent Review of the NDIS](#) identified the need for a more consistent approach to registration. Particularly, one that applies to all providers based on the level of risk involved.
- The [Own Motion Inquiry into how Platform Providers operate in the NDIS market](#) (the Inquiry) Insights Report was published in 2023. During the Inquiry we spoke to close to 1500 people, the majority of those being people with disability who used Platform Providers. Participants told us that while Platform Providers allow them to choose who comes into their home and when, more is needed to be done to improve service quality and safeguards in this part of the NDIS market.

In the Inquiry, we heard of concerns about service quality, privacy, complaint handling, and confusion about roles and responsibilities which impacted on the delivery of safe and good services. We also heard that it was difficult for participants to understand the quality of the services provided.

- The [NDIS Provider and Worker Registration Taskforce](#) in mid-2024 said some types of providers as higher risk. They proposed that all providers of SIL and home and living supports be registered within 12 months. The taskforce also recommended Platform Providers be required to be registered, based on the services provided.

What is changing

Registration will become mandatory for:

- Platform Providers
- Support Coordinators
- SIL providers.

These changes will be introduced gradually, to make sure providers and participants have time to adjust.

What the reforms aim to achieve

Mandatory registration aims to make NDIS services safer and more consistent. The main goals are:

- **Stronger safeguards:** All providers must meet minimum standards and are subject to regulatory oversight.
- **Improved quality and consistency:** There will be clearer expectations for provider competence.
- **Greater transparency and accountability:** It will be clearer to see who is delivering services and how they are doing it.

The NDIS Commission will work closely with providers and others in the sector to make sure the process is fair, clear, and gives everyone enough time to adapt.

Consultation approach

To help shape the reforms, the NDIS Commission asked for public feedback in late 2024. We asked providers, participants, and broader community stakeholders how best to implement the changes. We consulted on the following:

- **Platform Providers:** A [public consultation paper](#) was released in November 2024. We wanted to hear from participants, their supporters, workers, providers, peak bodies and other Government agencies to understand how to define Platform Providers and implement mandatory registration under the current framework in a way that encourages choice, control and innovation while addressing the issues of quality and safety identified.
- **Support Coordination and SIL:** We also ran consultations on mandatory registration for Support Coordinators and SIL providers. Stakeholders were invited to provide feedback via written submissions and an online survey, which closed in March 2025. The outcomes of these consultations are reported in a separate publication.

What we wanted to know about

Currently, Platform Providers are not required to be registered with the NDIS Commission. Those Platform Providers who are registered with the NDIS Commission apply to be registered for the class of support delivered using their platform. The platform service they offer is not defined or formally recognised. Mandatory registration of Platform Providers is a key step towards tailoring the registration of this market segment to ensure the services and supports that occur through platforms are safe and of high quality.

We wanted to hear from participants, their supporters, workers, providers, peak bodies and other Government agencies to understand how to define Platform Providers and implement mandatory registration under the current framework in a way that encourages choice, control and innovation in the NDIS market while addressing the issues of quality and safety identified.

In the context of consultation, there were two certainties. The first is that Platform Providers will be required to be registered with the NDIS Commission. The second is that no changes or transition to mandatory registration will happen before 1 July 2025. How Platform Providers are defined and

what the transition to registration should look like for Platform Providers was the focus of the consultation.

Consultation questions can be found at [Appendix A – Consultation](#)

Who we heard from

We believe that good reforms need input from the people most affected. We consulted with:

- participants and their supporters
- workers
- providers
- peak bodies
- other Government agencies.

We received:

- **299 survey responses** (60 from participants and their supporters, 137 from workers, 72 from providers, 30 others)
- **68 written submissions**, including:
 - 26 in response to our [consultation paper](#) published in November 2024
 - 42 about wider registration changes.

We consulted with providers, via a **Platform Provider Consultative Forum** (Consultative Forum). The Consultative Forum adopted a whole of Government approach to reform and included 18 different Platform Providers and other Government agencies. The insights from the survey and submissions as well as previous insights from the Inquiry informed the conversation on:

- Platform Provider definition
- Obligations of Platform Providers
- Implementation of mandatory registration

Note on the workforce: This report uses the terms ‘worker’ or ‘workforce’ to describe people who deliver support through platforms. The NDIS Commission knows there are many kinds of working relationships on Platforms. The terms are meant to include anyone delivering services via a platform.

How we analysed the feedback

All comments from the survey and written submissions were carefully reviewed using a structured approach to analysis. You can read more about how this was done in [Appendix B – Analysis approach](#).

What we heard

Regulation that supports quality, safety, choice and innovation

We heard in the Inquiry that Platform Providers play an important role in supporting participant's choice, control and flexibility. They are also an example of innovation in the NDIS market. This consultation continued the conversation from the Inquiry, by seeking input on how we encourage choice, control and innovation in the NDIS market while addressing the quality and safety issues identified in the Inquiry.

Keeping what participants and worker's value while improving quality and safety

We wanted to better understand the relationship between participants, workers and Platform Providers. This helps us define what a Platform Provider is and protect the things that participants and workers value most about them.

Participants told us that they choose to use Platform Providers for choice (85%), flexibility (67%) and control over the cost (59%). People often use Platform Providers when they need flexible support or when other services aren't available. In fact, 77% of participants in our survey said they use platforms for less than 10 hours a week, or only when their regular supports can't help.

Like the Inquiry, we heard how important the choice offered by platforms is for participants, especially those from Culturally and Linguistically Diverse (CALD) backgrounds, First Nations communities and LGBTQIA+ people.

“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 individuals workers.”

– Peak body written submission

Participants told us that it was important for them to choose workers through platforms that have the right attitude and values, are a good fit, have experience with people with a disability and hold a NDIS worker screening.

Workers chose to connect to participants via Platform Providers for safety (43%), flexibility (43%), choice (38%) and having the Platform Provider handle payment (35%). Workers tended to provide services and supports via multiple Platform Providers, often in a part time capacity.

Nearly 50% of the Platform Provider workforce reported using more than one Platform Provider. Platform Providers told us that workers tended to move between platforms when they perceived that onboarding or administration of a Platform Provider was onerous. There was a desire from providers to ensure a consistent minimum standard for onboarding and worker requirements.

Platform Providers have a key role in ensuring the quality and safety of services and supports delivered through their platform

During this consultation we heard that there continues to be concerns around the quality and safety of services delivered via platforms. Nearly half (46%) of all participants who completed our survey reported having a negative experience with a platform in the last 12 months.

We heard that participants, workers and providers saw Platform Providers as having an active role in supporting the quality and safety of services delivered via a Platform Provider.

- **74% of participants** said that Platform Providers are responsible for safeguarding participants
- **80% of Platform Providers** said that they were responsible for safeguarding participants
- **70% of workers** said that Platform Providers are responsible for the quality of services delivered.

Participants and workers generally expected platforms to take care of important tasks like:

- connecting participants to workers
- handling payment and service agreements
- worker screening
- checking backgrounds and qualifications
- keeping participants safe.

Participants said workers should be responsible for setting prices and reporting injuries. Both participants and workers said that workplace health and safety is a shared responsibility between the worker and the platform. Workers saw service agreements as a shared responsibility too between the worker, participant, and platform.

Stakeholders frequently told us that registration should focus on Platform Providers increasing the safety and quality of services delivered through their platform.

“Clear guidance for Platform Providers on implementing consistent safeguarding measures would be beneficial, promoting transparency and helping participants understand the platform's role in the support relationship. However, accountability remains a shared responsibility among support workers, participants, and Platform Providers”

- Supporter on behalf of an NDIS participant survey response

We heard feedback about the role of **the workforce** in regulation and registration. Some stakeholders suggested that the workforce should be the focus of registration, and the definition and obligations should reflect this. However, others argued that the risks posed by workers using platforms to deliver poor quality services could not be separated from the role Platform Providers play in verifying workers and collecting information about incidents and issues. We also heard about the need for clarity over the relationship between platforms and their workforce.

“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.”

-Peak body written submission

Our initial view is that Platform Providers have an important role in influencing the quality and safety of services delivered through their platform, regardless of whether their users are their employees or contractors. Platforms generally offer key safeguarding mechanisms, such as background checking, payment processing and incident reporting, that reflects their role as more than just a portal. As a result, registration and subsequent obligations should focus on Platform Providers, rather than the workforce. Platform Providers have a role to play in ensuring platform users understand their obligations (e.g. under the NDIS Code of Conduct) and registration can support this.

We also heard that registration should be designed with the **participant experience** in mind. Participants should be supported to access safe, good quality, and affordable platforms. It should also be easy for participants to make informed choices and understand who is responsible for what.

“Participants should be fully aware that using a platform provider means taking on greater responsibility and ownership of their support arrangements. This shift in accountability should be clearly communicated when participants choose this option over traditional service delivery models with direct staff management.”

– Supporter on behalf of an NDIS participant survey response

Safeguarding choice and control

During our consultation, we asked about the possible benefits and risks of introducing mandatory registration for Platform Providers, and how this could affect the quality and safety of services.

Both participants and workers who responded to our survey saw benefits to mandatory registration.

Participants said it could lead to:

- clearer rules and standards
- better accountability
- clearer roles and expectations
- a better overall experience.

Workers said it could help by:

- improving accountability and oversight
- lifting service quality.

Public submissions also supported the idea, saying it could:

- make services safer for participants
- improve privacy protections.

“All participants and workers will be aware of the rules and standards, not just seeking a quick pay without qualification or understanding”

– Peak body written submission

“Safer services for participants and their families, providers have knowledge over staff training development and probity checks”

– NDIS provider written submission

Participants and workers also raised concerns about the potential impact of mandatory registration, particularly on participant choice of providers and how participants engage with their supports.

“I’m concerned that this approach could unintentionally take away the choice and control that are so vital to people like me. These platforms allow me to find people who are not only skilled but also share my values and are willing to adapt to my needs.”

– NDIS participant written submission

“I choose a platform so I do not have to share leads of my personal information with the platform, because it is none of their business. I share what I need to share directly with the support worker. Registration will surely require the platform to capture a lot more information about my family member.”

– Supporter on behalf of an NDIS participant survey response

Workers responding to the survey echoed these concerns, noting reduced choice and control, and increased regulatory burden which risked workers exiting this segment of the market. This view was also echoed in public submissions.

“You are going to lose a lot of really good workers who choose not to work for registered providers for various reasons of their own choosing and you will leave 1,000’s of participants without support.”

– Supporter on behalf of an NDIS participant survey response

“Support workers who want to avoid accountability could simply leave platforms and operate independently via Facebook etc, potentially increasing risks for participants. When support workers operate outside the platform system, there’s a loss of oversight and potential for things to go wrong with less support available for both the participant and the worker.”

– Supporter on behalf of an NDIS participant survey response

While some participants, workers and providers expressed concerns about the risk of disruption to current arrangements, we also heard from stakeholders that registration can enhance the availability and sustainability of quality supports.

“We believe that by enhancing the regulatory framework for Platform Providers, strengthening participant safeguards, and ensuring that individuals receive high-quality, accessible services, we can create a more equitable and responsive NDIS”

– Peak body written submission

"Mandatory registration (will) mean participants will no longer need to choose between flexibility and safety. All providers would meet clear, consistent standards, reducing the risk of harm and strengthening the integrity of the NDIS".

– NDIS Provider written submission

"Registration of platform providers brings more provider choices into the same arena."

– Peak body written submission

We heard from stakeholders of the importance of registration to support oversight, market stewardship and ongoing integrity of this new and innovative market segment.

"Without mandatory registration, unregulated platforms will continue to exploit loopholes, perpetuating a race to the bottom in worker conditions and service quality. This not only harms participants and workers but also threatens the integrity and sustainability of the wider market of providers and the NDIS itself."

– Peak body written submission

There were mixed views expressed by stakeholders, about the current registration process. Some stakeholders shared how the cost associated with registration can be high, and the audit process can be too admin focused at the expense of promoting quality and safety.

"The process of registering can be burdensome and may stifle flexibility, creativity, and responsiveness from providers, particularly small or niche ones who might offer unique and innovative services that meet the diverse needs of participants."

– NDIS worker survey response

"I believe that due to all documents and auditing the providers are more inclined to provide better practices and safeguards"

– NDIS worker survey response

"There is no colleration [sic] between quality and mandatory registration, it is more likely to reduce options which will make the market less competitive. Competition is more likely to encourgae [sic] innovative practice than complusory [sic] rego ever will."

– Supporter on behalf of an NDIS participant survey response

We know that Platform Providers help drive innovation and give participants real choice in how, when, and by whom they receive services. We want that to continue. That is why we are working to design registration rules that support genuine and quality choice in the market.

Defining Platform Providers

How we consulted on the Platform Provider definition

Before we can register Platform Providers, we need to clearly define what a Platform Provider is. We want a definition that:

- helps us regulate the NDIS market
- makes it clear which platforms are covered by the rules
- helps participants, workers, and providers understand their responsibilities.

“A well-defined and consistent approach will provide clarity for participants, workers, and providers while ensuring appropriate regulatory oversight.”

– NDIS provider written submission

To help us define Platform Providers, we looked at other laws and reports on digital platforms. We also engaged broadly and in targeted forums to get feedback on how we should approach the definition. These included:

- **Broad consultation** with the public, including participants, disability representative organisations and providers, through the public survey and submissions;
- **Targeted consultation** on four potential approaches to defining platforms through our Consultative Forum; and
- **Targeted consultation** on definitional issues with other Government agencies (Aged Care Quality and Safety Commission, Department of Employment and Workplace Relations, Department of Health and Aged Care, the Fair Work Commission and the Fair Work Ombudsman).

As part of the broad consultation, we sought feedback on our initial view that the definition of Platform Providers should only capture NDIS services and we would define what platforms are by describing the shared features of Platform Providers. We also shared our view that it might be helpful to have the power to formally name organisations as Platform Providers (this is called designation).

To further refine this, as part of our targeted consultations, we proposed four potential models for a definition based on the research we had done into existing definitions. They included:

- Model 1 – Based on our Own Motion Inquiry into Platform Providers
- Model 2 – Based on the Aged Care Act (adapted for the NDIS)
- Model 3 – Based on the Fair Work Act (adapted for the NDIS)
- Model 4 – A “Designation Model” where we name providers directly

You can find more information on our potential models in the discussion paper we prepared for the Consultative Forum.

We received significant feedback on our approach to defining platforms from Government and provider stakeholders. Overall, there was broad support for our approach to defining Platform Providers, particularly from responses to our public survey.

People told us there were still some key questions to work through before finalising the definition. In the next sections of the paper, we will explore those themes in more detail.

Platform Providers should be defined by their shared features

Most people we consulted agreed that Platform Providers should be defined based on their shared features.

Stakeholders generally supported the features that we identified as important to defining Platform Providers, which included:

- what the platform does (its function)
- only platforms that deliver NDIS services
- charging fees to users
- the use of technology to deliver services.

The function of a platform was especially common in the feedback we received and a focus of in-depth discussions in the Consultative Forum. We heard a range of descriptions for how platforms work. Some described them as:

- a way to connect participants and workers (intermediaries or connecting services)
- a type of matchmaking or brokerage service
- a mix of a traditional provider and a connecting service
- an example of modern, innovative service delivery.

“[Platforms are] a mode of service delivery or a mode of service facilitation...”

– NDIS provider written submission

“while technology has modernised access to and control over services, it has not changed the fundamental nature of service delivery.”

– NDIS provider written submission

These varied responses reflect the many different models that Platform Providers offer to NDIS participants. Some platforms play a role facilitating service delivery, while others play an active part in delivering the services to participants. Because of this, we think it's important to define Platform Providers by their shared feature of connecting participants.

We also heard that the definition needs to be broad enough to capture the variety of different ways that Platform Providers charge fees, and recognising that platforms offer a wide range of NDIS services and supports. Some submissions highlighted the need for a broad definition to ensure that new types of platforms are captured over time. However, we also heard concerns from some providers about setting the definition too broadly and creating extra burden for smaller providers.

“Platform providers operate from a range of different models and have varied relationships with the workers who directly deliver services to participants... The models and approaches of platform providers will continue to evolve, and the right definition is needed for regulation and oversight to keep up with the evolution.”

– Peak body written submission

We heard general support for ensuring that our definition only captures services that receive NDIS payments.

“For platforms like ours, registration does not make sense as we are providing a simple directory service. Literally all we do is allow providers and participants to register on our website and find each other.”

– NDIS provider written submission

Our approach should build on the definitions of other regulators

We looked at how other sectors (like aged care and workplace relations) define similar platforms, to see if we could align our approach.

We presented four possible definition models at the Consultative Forum. The strongest support was for:

- Model 1: Based on our own inquiry into Platform Providers
- Model 2: Based on the Aged Care Act

The Consultative Forum supported consistency where possible. Forum attendees that supported these models highlighted that Model 1 is simple and captures a wide range of providers and Model 2 aligns with aged care and reflects the unique features of platforms. Some people suggested combining useful elements from different models.

We also discussed giving the NDIS Commission the power to formally name (or ‘designate’) a provider as a Platform Provider. Similar abilities have been included in other definitions, such as in the Aged Care and Fair Work approaches. There was general support for this, especially to prevent providers from avoiding their responsibilities. But some said this power must be used carefully and not unfairly.

“Granting the Commission the authority to designate an organisation as Platform Providers is a critical safeguard, ensuring that new and evolving entities, regardless of whether they fit neatly into initial definitions, are subject to regulation.”

– Peak body written submission

“There should be checks and balances on the NDIS Commission’s ability to designate Platform Providers outside of its given definition of a Platform Provider, and it should not be a unilateral or arbitrary decision”

– Peak body written submission

Further work is needed to finalise our definition

We have heard a lot of feedback on how we should develop our definition. But there are still issues we need to work through before finalising the definition.

Stakeholders told us about some risks that we needed to consider as we define Platform Providers. These include:

- obligations under the Fair Work Act
- the risk that some workers might leave platforms to avoid new rules
- the risk of the definition being so broad that it accidentally includes social media or online marketplaces

“If platforms are asked to regulate contractors to the extent that it mirrors employer-employee relationships, it could create “employee-like” arrangements. This might blur the lines between independent contractor... and employment...”

- Supporter on behalf of an NDIS participant survey response

Another key issue is whether or not to include mainstream platforms in the definition. Mainstream platforms are digital platforms that connect users to a wide range of services, such as accommodation, transport and meal delivery, not just NDIS supports. Some of them do receive NDIS payments from participants but are already monitored by other regulatory systems. We are doing further consultation on this topic to inform our final decision.

“(consideration should be given to) prevent regulatory overreach, and ensure the Commission’s safeguards are focused where they are most needed”

– NDIS provider written submission

Registration Obligations and Implementation

Obligations should focus on improving safety and quality

Our consultation focused on how mandatory registration should be applied to Platform Providers. This included what obligations should be imposed as part of mandatory registration, and how implementation of these obligations could occur in a way that caused minimal disruption to the market. This section will consider these issues in more detail.

During consultation, stakeholders shared with us their main hopes and concerns held about introducing new requirements for Platform Providers. We have taken these concerns on board, particularly those around maintaining choice and the risk of regulatory burden, in the way we have considered what obligations are appropriate for platforms. We have also considered the benefits highlighted, including improved safety and quality of services delivered through platforms, as a guide for mandatory registration.

We received a lot of feedback on obligations that could improve safeguards for participants, improve the quality of services on the platform, and improve transparency and information available to participants and users delivering services.

Safeguarding and protections

Safeguards and protections for users of platforms was a common theme raised in responses to our consultation paper. Participants responding to our survey often mentioned the need for more measures aimed at counteracting fraud or abuse. Workers commonly suggested more mandatory

training. Submissions echoed the need for training requirements, as well as worker screening. During our Consultative Forum, Platform Providers told us they were generally supportive of common baseline requirements for safeguarding, such as worker screening, incident reporting and complaint management. As a whole, we heard clearly that obligations that improved the safety of services delivered, and that offered additional safeguards, were key to Platform Provider registration.

“Mandatory registration will ensure that all platform providers meet these baseline standards, thereby creating fairer market conditions for all providers and ensuring participants are no longer exposed to radically different and opaque safety standards between providers.”

– Peak body written submission

“The safety features they [already] offer - like worker verification, insurance, and complaint handling - gives myself and my support team the confidence without compromising my ability to make choices that work for me.”

– NDIS participant written submission

Service quality

Another common theme, we heard was that obligations should drive improvements in service quality. Participants suggested having clearer service agreements, training for workers, and more responsibility for platforms to ensure their matching process was effective as ways to improve quality.

Workers highlighted minimum qualification requirements as a potential mechanism to improve service quality. Some responses questioned how effectively obligations could improve the quality of services, particularly for platforms with less oversight. Submissions highlighted the importance of setting standards for the services delivered through platforms, though noted that this may need to be supported with pricing changes.

In our Consultative Forum, Platform Providers said existing standards for registered providers are a good base for setting expectations for quality.

Registration ensures the correct checks are in place like police checks, registration of governing bodies and basics like first aid.

– NDIS worker survey response

We heard that it is important that any requirements on Platform Providers recognise the unique role platforms play in facilitating services.

“The NDIS Commission should ensure that Platform Providers are held to equivalent standards while recognising the unique nature of their service model”

– Peak body written submission

Information to support choice

We also heard that should be easier to compare services. Both participants and workers noted that obligations could encourage more transparency around fees charged by platforms and the quality of the services. Workers also noted that these obligations could help to clarify the difference between the roles of workers and the platforms themselves.

“Public reporting requirements on key indicators such as worker screening and training compliance; complaints data and resolution rates; and pricing structures and Platform fees, ensuring participants can easily understand the true cost of services.”

– Peak body written submission

In addition, many people said this should be the first step in broader changes. There were calls for broader reforms, including worker registration and improvements in practice standards and audit processes to support regulation of Platform Providers.

“Regulating Platform Providers is a logical first step because it addresses a clear and pressing issue while setting a precedent for broader reforms.”

– Peak body written submission

Overall, we have heard that mandatory registration should impose obligations on Platform Providers that have an impact in several key areas:

- Safety of services and the safeguards available to NDIS participants
- Quality of the workforce and services delivered
- Transparency around service quality, fees charged and similar issues

Obligations need to match the platform’s function and proximity to service delivery

While we heard significant feedback about what the obligations of platforms should be, we also heard feedback from stakeholders about the risks of treating all platforms the same. Several participants and workers expressed concern that imposing strict obligations on all platforms could lead to platforms or workers exiting the market. Several platforms highlighted that the different models of Platform Providers meant varied oversight of the activities of their users. This means that for some Platform Providers, implementing the current requirements of registration would be relatively simple, while for others, significant changes would need to be made. We heard that a one-size fits all approach to obligations and registration could have unintended consequences, including discouraging users delivering services from signing up through the platform, and reducing innovation and choice.

“[Risk of] Over regulation of the service which impedes the participants right to choice and control”

– NDIS worker survey response

“We strongly believe that the registration framework must be proportionate, consistent, and fair to ensure that the transition to mandatory registration supports positive outcomes for participants, workers, and providers alike.”

– NDIS provider written submission

In response, some stakeholders raised the idea of proportionate obligations and requirements. We heard that such an approach could reduce the risk of excessive regulatory burden, and ensure that new platforms could enter the market and compete. We also heard that there are other ways of reducing burden while implementing the requirements, including aligning our requirements with Aged Care’s new obligations for platforms.

“Apply proportionality in registration, audits, and compliance expectations. Proportionality needs to be built in across all aspects of regulation.”

– Peak body written submission

“A tiered registration system should be implemented, with stricter requirements for higher-risk support areas like personal care and early intervention. Providers with minimal participant contact or offering generic services might require lighter-touch registration.”

– Peak body written submission

“To encourage continued innovation, any registration process must enable different registration requirements based on the assessed risk of the platform. Otherwise, the registration regime risks stifling innovation and some providers will end up over-regulated.”

– NDIS provider written submission

Implementation should be carefully managed to minimise disruption and uncertainty

We also heard feedback about how we could support participants, Platform Providers and the workforce as we implement these changes. We heard from participants and workers about what support they required to prepare for the transition to mandatory registration. Over half of participants and carers responding to our survey indicated they needed more time to be prepared for mandatory registration, and over 30% of workers felt the same. Considering these figures, we have listened to other feedback from submissions and our Consultative Forum about how we can ensure that implementation goes as smoothly as possible.

People said they want clear timelines, good communication, and enough support. They gave us some suggestions including:

- sharing simple, clear information about the changes
- providing training and support to providers and auditors
- exploring tech options to make reporting easier (e.g. APIs).

We are considering this feedback in planning our next steps. We have already committed to provide accessible, clear and straightforward information about the reform process.

“The Commission must take the lead in providing clear, factual information (for both participants and Platform Providers) to counter misinformation and ensure providers fully understand their responsibilities.”

– NDIS provider written submission

“Ensure effective and accessible communication from both the NDIS Commission and Platform Providers to ensure a successful transition to mandatory registration. The NDIS Commission must ensure Platform Providers understand their responsibilities and communicate these clearly and accessibly to workers and NDIS participants.”

– Peak body written submission

We were also told about some risks that we need to think about when planning our implementation.

- **Concurrent reform:** Platform Providers that operate across both the NDIS and Aged Care flagged that Aged Care is also undergoing a period of significant reform, with new requirements for digital platforms due to come into effect later in 2025, which require consideration.
- **Rural and Remote:** several submissions raised concerns about the impacts of mandatory registration in areas with limited existing services, such as rural and regional areas. Concerns around this included regulatory burden discouraging workers from signing up to platforms, the cultural safety of registration processes, and the need for support for participants affected if any provider or worker leaves the market.

“the financial and administrative challenges associated with mandatory registration may increase costs for participants and further exacerbate thin markets, particularly in rural and remote areas.”

– Peak body written submission

We also heard about the importance of engaging with participants through the implementation process.

“[Co-design a transition management plan including] Mapping to identify those at highest risk of losing supports during the transition to mandatory registration and assess community need to determine what kind of safeguards and alternative arrangements are required to ensure sufficient supports are in place.”

– Peak body written submission

Next steps

Defining Platforms

We have heard a lot of helpful feedback about how to define a Platform Provider. Based on what people told us, we will:

- use a definition based on shared features of platforms, including by their role of connecting participants with services and supports.
- make sure the definition only applies to platforms that get paid through NDIS funding
- try to make the definition simple and consistent with other sectors
- keep talking to other Government agencies to help shape the definition
- ask participants for their thoughts on whether mandatory registration should also include platforms that do not focus on connecting them with NDIS-specific services, like accommodation and transport platforms.

Regulation that supports quality, safety, choice and innovation

We received feedback about the need to recognise the unique role of Platforms Providers, while ensuring registration uplifts the quality and safety of these services. The information we received through consultation is informing how we are thinking about registering Platform Providers. We are considering registration that provides clarity over the role of platforms, while also ensuring platforms meet mandatory requirements for all registered providers, specifically those undergoing certification audits. This could include obligations such as worker screening requirements, and requirements around complaint and incident management. We are testing these ideas out with participants.

Implementation

We are considering the feedback we have heard through consultation and in planning our next steps to implement this reform. We are committed to providing accessible, clear and straightforward information about the reform process. Before any legislation is introduced, we will publish a draft that explains the changes and the timeline.

We are committed to transition to the new regulatory settings in a staged and considered way. We will provide clear notice periods, and access to guidance and information before any changes to registration take effect. We will also continue to share information updates about the progress of regulatory reform work on our website and on social media.

Appendix A – Consultation topics

Regulation that supports quality, safety, choice and innovation

- How can the registration of Platform Providers support Platform Providers to deliver high quality and safe services?
- How can the registration of Platform Providers ensure that innovation and choice and control are maintained and encouraged?
- How can the NDIS Commission ensure a smooth transition to mandatory registration for participants, workers and providers?

Definition Platform Providers

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

Appendix B – Analysis approach

The analysis involved the following steps:

- Data preparation and familiarisation
 - All qualitative responses were compiled, cleaned, and reviewed to ensure completeness.
 - We undertook a familiarisation process to understand the tone, content, and scope of feedback across different respondent groups.
- Coding and thematic analysis
 - A combination of inductive coding (allowing themes to emerge naturally from the data) and deductive coding (based on pre-identified consultation topics) was applied.
- Organisation of insights
 - Insights were categorised under three overarching themes, which aligned with the structure of the consultation and reflected the most common areas of feedback:
 - » What we heard about regulation that supports quality, safety, choice and innovation
 - » What we heard about defining Platform Providers
 - » What we heard about registration obligations and implementation