

Regulatory Policy, Insights and Review Branch
NDIS Quality and Safeguards Commission
Consultation@ndiscommission.gov.au

28 March 2025

Attention: Regulatory Policy, Insights and Review Branch, NDIS Quality and Safeguards Commission

Please accept this letter as Children and Young People Australia (CYDA)'s submission to the NDIS Quality and Safeguards Commission's (NDIS Commission) Registration of Platform Providers consultation paper.

Thank you for the opportunity to provide written feedback on this consultation paper.

Children and Young People with Disability Australia (CYDA)

CYDA is the national representative organisation for children and young people with disability aged 0 to 25 years. CYDA has extensive national networks of young people with disability, their families and caregivers, and advocacy and community organisations.

Our vision is that children and young people with disability in Australia will fully exercise their rights, realise their aspirations and thrive in all communities.

CYDA's Response to the consultation paper

Our response is informed by the lived experience and expertise of our membership of children and young people with disability and their families and caregivers, as well as CYDA staff with lived and family experience of disability.

In 2024, CYDA's Provider Registration survey received responses from 161 young people with disability, their families and carers sharing their views on NDIS registration of providers and workers.¹ This survey highlighted apprehensiveness about registration, with 71% of respondents concerned about the negative impact registration may have on their safety, needs, choice and control. Many of these concerns are relevant to the process of registering Platform Providers, and we highlight pertinent examples in this letter.

¹ [CYDA \(2024\) Submission to the NDIS Provider and Worker Registration Taskforce](#)

Our response and recommendations address topics raised in the consultation paper relating to ensuring that registration encourages and maintains safety, quality, innovation, choice and control; ensuring a smooth transition to Platform registration for participants, workers and providers; and the benefits and risks of defining Platform Providers.

Summary of Recommendations

- 1. Preserve the unique and innovative features Platform Providers offer as channels to tailor bespoke services and provide continuity of care**, to ensure that the reason NDIS participants use Platform Providers as a matter of preference is retained.
- 2. Create clear yet flexible registration guidelines and requirements for Platform Providers that embed safety while enabling choice and control**, through working with diverse Platform Providers to ensure that registration promotes safety and quality without becoming a barrier to attracting and retaining services.
- 3. Ensure effective and accessible communication** from both the NDIS Commission and Platform Providers, to ensure a successful transition to mandatory registration.

Recommendation 1: Preserve the unique and innovative features Platform Providers offer as channels to tailor bespoke services and provide continuity of care.

To make sure the move to registering Platform Providers supports high quality and safe services, it is important the NDIS Commission recognises, retains and does not inadvertently stymie the unique features that have caused NDIS participants to turn to such Platforms as a matter of preference in the first place. These unique features include:

- Capacity to tailor and personalise services to specific and intersectional needs
- Longevity and continuity of relationships between workers and NDIS participants
- Service that enables participants to feel part of their community rather than segregated into disability-specific service systems
- Flexibility and choice
- Ease of accessing services.

Such features are particularly important for children and young people with complex needs, intersectional experiences and diverse backgrounds, as highlighted by respondents from CYDA's 2024 Provider Registration survey:

"I'm trans and queer, and my disabilities are generally not well understood" (Young person with disability, under 25).

“I want to be able to continue to engage flexibly - people WE select, train and coach. Any barriers to selecting good people who don’t want to be full time disability professionals but want to be involved in local community [...] would really be very worrying for us” (Parent/carer of child/young person with disability).

This point is supported in the final report from the Disability Royal Commission² which found that to prevent violence, abuse, neglect and exploitation, service providers need to:

- Embed human rights approaches into policy and processes
- Ensure service practices do not limit choice and control
- Create a culture of transparency
- Foster inclusion in the community.

The following case study of a parent of a 9-year-old child with disability further illustrates the choice and control afforded by Platform Providers when compared to larger agencies.

Case study: What Platform Providers Offer that Agencies Don’t

Last year my son went through a very difficult time with school. His disability related needs were not being accommodated, and our home life became extremely stressful. It was difficult for me to manage his access needs while also taking care of his young sister, and he was becoming very isolated. I needed to find a support worker for a few hours a week to take him to activities, so he could get out into his community and build his skills. I first spoke to a larger agency, but they matched support workers and participants through availability rather than interests and skills. This was too general for us – I couldn’t have just anyone turning up because if they didn’t have the right approach, he never would have gone with them. They also might not have been comfortable going to our local skate park. I ended up using a Platform Provider because they provided me with the ability to tailor the support to be local, inclusive and understanding. I could choose someone in our area whose profile matched my child and who was already part of our local community. I looked for someone active and outdoorsy who would understand my child’s anxiety and be inclusive of our rainbow (two-mum) family. I found a kind, active young man who fit this profile and took my son skateboarding. This has provided my son with skills as well as a social outlet, as the support person was socially skilled enough to facilitate interactions with other children that my son was missing. - *Parent of 9-year-old child with disability, 2025.*

² [Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability: Final Report, Vol 10](#)

Our suggestions for how the NDIS Commission could support preserving the unique features of Platforms include:

- Instate a broad yet clear definition of Platform Providers that references both safety and innovation/uniqueness. We are supportive of the broad definition proposed in the consultation paper, and further suggest that the definition should include both an assurance of the safety measures that registration will embed in Platforms, and highlight the unique and innovative features Platforms can offer, such as the ability to exercise choice and control through tailoring services and workers, to meet complex and intersectional needs.
- Ensure registration processes are broad and accessible enough to enable Platform Providers to attract and retain a diverse range of workers and services (both disability and non-disability specific) – including workers with local connections and knowledge, and skills and interests that are both disability-informed, inclusive, and safe, as well as holistic (see above case study for an example of how a tailored service was provided through matching interest in skateboarding, social awareness and inclusivity, and local knowledge rather than disability-specific supports)
- Offer support, capability building, and training to Platform Providers in how to create accessible and user-friendly interfaces that encourage ease of access for both workers and participants
- As part of this support to Platform Providers, encourage the development of Platform features that enable safe continuity of care, such as ongoing communication between workers and participants (for example, a safe and accessible messaging service as part of Platforms).

Recommendation 2: Create clear yet flexible registration guidelines and reporting requirements for Platform Providers that embed safety while encouraging choice and control.

Noting that flexibility, choice, and control were identified by our membership in our 2024 Provider Registration survey as vitally important, CYDA cautions against the imposition of inflexible regulatory reporting requirements on Platform Providers. Processes that disincentivise the use of Platforms by workers are likely to reduce the number of workers available and eventually impact participant use of the Platform. This would limit choice and control for participants.

The presence of Platform Providers in rural and regional locations are particularly critical for providing choice and control for participants in these areas, who face specific barriers

in accessing information, assessment, and support through a lack of NDIS workforce, disability workers and health professionals on the ground.³

This means careful and flexible implementation of registration requirements will be crucial to keeping workers engaged with Platform Providers, to not inadvertently introduce another barrier and to maintain choice and control as “...in a regional area we are already very limited” (Parent/carer of child/young person with disability, CYDA Provider Registration survey).

We support the broad approach to defining Platform Providers indicated in the consultation paper. The approach accommodates differences between Platforms, but it will also be important to accommodate differences in the design of the registration process.

We therefore suggest it is crucial that the NDIS Commission works collaboratively to support Platform Providers to design registration guidelines that can be embedded into the different existing administrative requirements and operational structure of diverse Platforms.

This would assist in creating user-friendly registration guidelines and processes that can be easily fulfilled by workers, and services using Platforms.

However, we emphasise that such flexibility in implementation should not be at the expense of safety. CYDA supports the introduction of streamlined safety measures such as standardised worker screening, adherence to Code of Conduct, and feedback and complaints processes as mechanisms to support safety.

Further, CYDA recommends these safety measures include capacity building and upskilling resources and opportunities for workers and Platform Providers in disability inclusivity, such as disability awareness training co-designed with the disability community, and cultural safety and awareness training for working with diverse communities including First Nations participants.

A best practice example of how to implement registration requirements both safely and flexibly is the National Office for Child Safety’s National Principles for Child Safe Organisations.⁴ The Principles are legislated in most states in Australia and organisations are provided with a number of practical and flexible tools including an annual self-assessment tool and checklists to demonstrate how they are adhering to the Principles.⁵ The flexibility of this approach has meant that organisations evaluate their own policies

³ The breadth of this issue is represented in the range of submissions to the [NDIS participant experience in rural, regional, and remote Australia Inquiry](#).

⁴ [National Office for Child Safety \(2025\) National Principles for Child Safe Organisations](#)

⁵ [Child Safe Organisations \(2025\) Practical Tools for Implementing the National Principles](#)

and practices, identify risks and gaps, and embed the approach of continuous improvement.

Such an approach would ensure that registration promotes safety and quality without becoming an added barrier to attracting and retaining services and workers to Platforms.

Recommendation 3: Ensure effective and accessible communication from both the NDIS Commission and Platform Providers to ensure a successful transition to mandatory registration.

Registration changes need to be accompanied by effective and accessible communication and engagement with providers, workers, and NDIS participants.

CYDA has consistently heard feedback from our membership of children and young people with disability and their families, that NDIS reforms, including registration changes, are being rushed through without adequate consultation and meaningful engagement.

This has led to high levels of confusion during recent NDIS consultation processes about changes to the rules of the scheme. *“The whole ndis is confusing”*, according to one parent/caregiver of a child or young person with disability.⁶

The 2023 Own Motion Inquiry into Platform Providers Operating in the NDIS Market noted that some challenges NDIS participants face in using Platform Providers included understanding the Platform’s role, fees, and the service relationship.

Platform Providers could mitigate many of these challenges through clearer, more transparent and more accessible communication to workers and NDIS participants. The transition to registration provides an opportunity to strengthen and maintain this communication.

The NDIS Commission must ensure Platform Providers understand their responsibilities and communicate these clearly and accessibly to workers and NDIS participants.

Our suggestions for how the NDIS Commission can ensure accessible and effective communication of changes include:

- Produce a set of accessible factsheets outlining the impact of any registration changes, to be made available to all participants that use Platform Providers, including in formats such as Easy Read

⁶ [CYDA \(2024\) NDIS Draft Lists Supports Survey](#)

- Run online accessible information sessions about the registration changes, including accessibility features such as Auslan interpreters
- Create an accessible Frequently Asked Questions webpage about mandatory registration of Platform Providers, including in formats such as Easy Read
- Require Platform Providers to display clear and accessible information on Platforms outlining the registration changes and how they will affect participants.

Further, we suggest that given the specific challenges to providing support in regional and remote areas, targeted engagement of participants and workers in those regions is needed to understand what barriers may exist to those providers undergoing registration. This engagement will be necessary to minimise the likelihood of regional and remote participants going without support.

Thank you again for this opportunity to make a submission to the NDIS Quality and Safeguards Commission's Registration of Platform Providers consultation paper.

If you have any questions about this letter or you would like to know more about CYDA's policy and research work please do not hesitate to contact Dr Liz Hudson, Policy and Research Manager at lizhudson@cyda.org.au, Dr Tess Altman, Policy and Research Officer at tessaltman@cyda.org.au, or Dr Shae Hunter at shaehunter@cyda.org.au.

Kind regards,



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