



NDIS Quality
and Safeguards
Commission

Insights Report

Own Motion Inquiry into how
Platform Providers operate in the
NDIS Market

September 2023



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Commissioner's Foreword



Access to a thriving, diverse market which promotes innovation and quality disability supports and services is a key principle of the National Disability Insurance Scheme (NDIS). The NDIS Quality and Safeguards Commission (NDIS Commission) is committed to promoting a market which delivers positive outcomes to NDIS participants. NDIS markets should promote and enhance participant choice and control over the supports and services they receive.

Thriving and diverse markets is one of three key areas of focus for the NDIS Commission. We identified this area as one where we will be able to make a significant impact, drive change and lift quality and safety. The NDIS Commission's *Strategic Plan 2022-2027* outlines this focus area and how we will measure success. Our plan outlines our intent to enable consumer independence for participants in the market through supporting market diversity and innovation and stimulating market growth.

In February 2023 I launched *The Own Motion Inquiry into Platform Providers Operating in the NDIS Market*, known as 'The Inquiry'. Platform providers have emerged across the globe in a range of industries. We at the NDIS Commission have been monitoring the growth of Platform Providers in the NDIS market with interest. We noticed that participant voices were getting lost in the many conversations being had around Platform Providers. To address this, I decided to turn up the volume on participant voices by putting them at the centre of this Inquiry.

Throughout the Inquiry, we had many conversations with participants, their supporters and other stakeholders. Over 1,462 participants, stakeholders and organisations attended consultations, completed surveys, and made submissions. Participants shared their experiences and expertise, taking time out of their busy lives to engage with our Inquiry. This report speaks to the themes that emerged throughout that engagement.

For the NDIS Commission, this Inquiry has confirmed there is more work to be done to ensure that participants, when engaging services via Platform Providers, can be assured the person delivering the service has been subjected to consistent background checks and has a foundational understanding of what it means to deliver safe supports and quality services to people with disability. As mentioned by a participant:

"Untrained, unqualified, ignorant people are playing with our lives."

We heard from participants who felt commodified, overwhelmed, underserved and at times unsafe. Exercising choice and control should never be at the cost of personal safety and participants have a right to feel seen and valued as consumers of services in the NDIS market.

There is a place for Platform Providers in the NDIS market. Participants were clear about this as they value the opportunity to connect to providers that are a good fit for them in a flexible way. As mentioned by a participant:

"I use them for flexibility, I can get staff pretty much wherever I want whenever I want... I can talk directly to the person without having to go through a third party."

However, participants also do a lot of the heavy lifting when using Platform Providers and evaluating whether these are value for money services. In the current environment, this presents challenges for participants, providers and the NDIS Commission. Enhanced transparency around the costs of platform services is essential, as is how the sensitive personal information of participants is managed.

The rich conversations and valuable evidence gathered over the course of this Inquiry will now be put to work. The NDIS Commission will:

- Undertake work to better support participants to make informed decisions as consumers of Platform Provider services;
- Establish a consistent and best practice approach to safeguarding across all Platform Provider services;
- Seek to increase transparency around Platform Provider activities, starting with pricing;
- Regulate more directly the workforce of NDIS providers which the Platform Provider market has created;
- Address the privacy concerns identified.

I would like to thank all the participants and stakeholders who took time to speak with us throughout this process. I look forward to continuing discussion as we seek to improve the lives and experiences of people engaging services and supports through Platform Providers.



Tracy Mackey

NDIS Quality and Safeguards Commissioner

04 September 2023

Our Approach

The purpose of this Inquiry was to examine how Platform Providers operate in the NDIS market. The Inquiry's [Terms of Reference](#) outline why it was important to conduct this Inquiry and what the Commissioner sought to achieve. The Inquiry focused on NDIS providers that offer online platform services that connect NDIS participants with NDIS services and supports.

This Insights Report summary provides a snapshot of what we have learned over the course of the Inquiry. A data and information supplement accompanies this report (provided separately on the Commission's website).

Participant Voices

A key purpose in conducting this Inquiry was to 'hear from participants and the sectors experience in engaging with Platform Providers'. The experience of participants engaging services via Platform Providers was central to this Inquiry's terms of reference and informed the design of our consultation process. Participants were generous in sharing their experiences which have significantly informed the Final Report.

The NDIS market is complex, as are the issues relevant to Platform Providers, regardless of complexity:

- Participants have a right to expect their NDIS services and supports to be delivered safely and competently
- Participants' goals, needs and preferences should be central to how their services are delivered

Our aim with this report was to be as direct and clear as participants were with us.

Participant Informed Themes

Four key themes emerged over the course of the Inquiry and they inform this report's structure. Each theme has its own section.

The four key insights outlined in this report were explored with reference to the Inquiry's Terms of Reference. Conversations were held and information gathered in relation to:

- Participants experience engaging services through Platform Providers
- Why participants are interested in what Platform Providers offer
- How Platform Providers operate in the NDIS market
- Participants views on what work needs to be done to improve service quality and safety

Data to Support Future Conversations

There is limited data publicly available on how Platform Providers operate in the NDIS market. We decided it was important to share any data we could while honouring the confidentiality

commitment we made to everyone who engaged with this Inquiry. The result is a data pack, provided as a supplement to the report and designed for public use. Our hope is that this data will assist the many stakeholders who are interested in this part of the NDIS market.

The data sources that informed the data pack include the NDIS Commission's own information, data obtained from the NDIA and information provided by Platform Providers we consulted directly. As we considered what was reported to us by participants and others during the Inquiry's consultation process, we noted that what participants reported, often aligned and is supported by the data.

A Quick Word about Platform Providers

For the purposes of this Own Motion Inquiry the term 'Platform Provider' is used to describe an NDIS provider (including registered and unregistered providers) that uses a profile-based platform (for example an app or website where participants and workers create a "profile") to connect participants with workers to deliver NDIS supports.

Other terms used to describe Platform Providers include online platforms, on-demand platforms, digital platforms, or direct reference to the name of the organisation using a platform model.

The delivery of NDIS supports via Platform Providers involves at least three main parties, the Platform Provider, the consumer and the service provider. Each platform operates under a unique business model determined by the Platform Provider and may include differences or commonalities in employment arrangements, fee's, commission, on-boarding arrangements, training, ongoing worker and consumer support, and organisations structures.

Most Platform Providers state they are free to join. However, Platform Providers may charge a fee to use the platform to book supports and services. This platform fee is separate from what worker's charge for their services. The platform fee may be charged to only the worker, only the participant or both.

A Quick Word about Workers

In this report we don't use the word worker to describe the people delivering NDIS services and supports via Platform Providers. Throughout this report you'll see the word 'provider' as a general description of any person or entity delivering NDIS services and supports to participants via platforms. We refer to 'providers' instead of workers to describe those delivering services to participants.

We encountered a variety of service relationships and observed them to be varied (and sometimes complex). We did not want to add to this complexity or cause confusion. We've not used the word worker simply because we did not want to suggest that anyone delivering NDIS services and supports to participants via platforms were employed only by the platform or the participant, it's just not that simple.

That said, regardless of whether a provider of services considers they are an employee; contractor; sub-contractor; casual employee; organisation; or sole proprietor, they are all involved in the delivery of NDIS services and supports to participants. They are also bound by the obligations set out in the NDIS Code of Conduct and regulated by the NDIS Commission.

Summary of Insights

The Participants engaging services through Platform Providers

In the period 1 July 2022 – 31 December 2022, over 13,000 participants engaged services and supports through a Platform Provider. Participants living in Victoria, New South Wales and Queensland use Platform Providers the most and generally those using these providers live in or close to a major city.

The primary disability of Platform Provider users are autism, psychosocial disability and intellectual disability. Nearly half of participants using Platform Providers have a reported moderate level of function and well over a third have a reported low level of function. Plan managed participants make up 65% of Platform Provider users. Participants aged 18 and under are unlikely to engage with Platform Providers (including via a parent or third party).

First Nations people are under-represented in the use of platform providers. Within the online survey results, 11% of participants who provided demographic information identified as LGBTIQ+. Between 8% and 12% of participants from our data identified as CALD. Through direct consultation with participants, we heard that the filtering functions some Platform Providers offer enabled participants to more easily engage with providers who were inclusive, supportive and respectful of identity.

Most participants use Platform Providers to engage support with community participation and personal activities. Participants also seek to limit the number of providers they engage. When selecting a provider via a Platform Provider, participants prioritised providers that appeared reliable and a good fit for their support needs.

Why participants are interested in what Platform Providers offer

Most participants said they engaged services through Platform Providers because they could exercise choice and control and services could be delivered more flexibly. Cost was also a consideration but not nearly as central to decision making as choice and flexibility. For a small number of participants, Platform Providers are their only means of accessing the services and supports they need.

Participants value the quality of their service relationships and expressed the greatest satisfaction in contexts where they felt heard, respected and truly supported by their providers. While some participants expressed a preference for particular Platform Providers, many were focused on finding a good fit service relationship.

Participants described significant whole of life benefits that a good fit service relationship provides. This sentiment was echoed by providers, who also expressed a greater sense of purpose and overall work satisfaction when they were engaged by a participant on the basis that they were a good fit for the participants needs. Beyond offering a means for participants and providers to connect, Platform Providers do not seem to add significant value for participants and providers to establish a successful service relationship.

Many of the participants and providers who engaged with the Inquiry were unsure of the nature of the relationship with the service provider and how the Platform Provider fitted in. While it seems only a few Platform Providers have a direct employment like relationship with the providers on their platforms, 70% of providers considered they were employees of the Platform Provider they were linked to. Participants hold similar assumptions with nearly 50% of participants considering they were consumers receiving a service and the Platform Provider was the employer. Very few participants thought that when they engaged services via Platform Providers that they could be employing the provider.

From a safeguarding perspective, regardless of the service setting, Platform Providers and anyone delivering services via Platform Providers are NDIS providers and regulated by the NDIS Commission and subject to the NDIS Code of Conduct.

How Platform Providers operate in the NDIS market

Platform Providers offer participants the opportunity to choose who supports them. This 'self-serve' model suits many participants. The importance of participants selecting and knowing who is going to be turning up to their homes cannot be understated. About 87% of participant payments via Platform Providers were for assistance with personal activities and community participation. Providers are likely to be present at participants' homes and to be around participants families as a practical (and important) support and part of their daily lives. Participants expressed it was essential to a good service experience that they feel safe and comfortable, and providers were a good fit for them and their families.

Platform Provider pricing structures are so variable that participants are unsure about how to evaluate whether Platform Providers offer a value for money service. Platform Providers don't make it easy for participants to compare service offerings including costs.

As we considered the variable pricing structures, we also found it challenging to compare the value for service offerings. We developed a comparison table relying only on information publicly available.

As mentioned by a participant:

"I can't easily get pay clarity when I want to pay above the award but below the price cap"

While most platforms are free to join, there is likely to be a fee system in place for providers, participants or both. A pricing comparison table is included in this section.

Participants told us that they are required to do the hard work when it comes to engaging and arranging services via platforms. Careful preparation by participants often goes into administration and planning. We heard that the burden is often experienced differently depending on the participant. As shared at consultation sessions:

"As a blind person, [I feel that] I cannot check the validity of all these [probity checks and qualifications] things"

Probity and background checking services undertaken by Platform Providers vary and can be limited. The values providers bring to the service relationship is key and participants told us they would like to see an NDIS market where best practice is promoted and ethical and rights-based providers are fostered.

Participants overall were less interested in the additional services Platform Providers offered beyond the opportunity to connect to providers. That said, some participants noted the value in training resources for providers offered on some platforms. Invoicing services were also noted as helpful.

Participants told us there's more work to be done on service quality and safety, and they are right

Participants described negative, and at times unsafe experiences associated with engaging suitable providers via Platform Providers. Participants hold reasonable expectations that Platform Providers will be proactive when it comes to safety and take quick and supportive action in response to a concern being raised. Safeguarding practices applied by Platform Providers were found to be varied, and often, insufficient.

Participants described feeling commodified. Participants said they would welcome complementary systems and safeguarding structures being applied behind the scenes and across the NDIS market. The consumer experience for participants using Platform Providers can be complex and onerous. Participants also share highly personal and often sensitive information via platforms. We heard accounts of inappropriate handling of participants' personal information.

When participants told us about what quality services looked like, they spoke less about formal qualifications and more about the attitudes of providers. Participants were in broad agreement that all providers of services in the NDIS market should understand the space they work in and know what person-centred support means in practice. Participants also advised that while they might have some control over the fees they pay providers for services, providers often expect to be paid 'top dollar' even when they're new and inexperienced.

NDIS Commission Next Steps

The insights gained from this Inquiry will enhance work currently underway. We also intend to:

- Better support NDIS participants to make informed decisions as consumers of Platform Provider services;
- Establish a consistent and best practice approach to safeguarding across all Platform Provider services;
- Increase transparency around Platform Provider activities, starting with pricing;
- Regulate the workforce of NDIS providers connected to the Platform Provider market more directly; and
- Address the privacy issues identified.

The Participants Accessing Platform Providers

Participants using Platform Providers

The data collected provided insight into who is accessing supports from Platform Providers. We decided to demonstrate the key characteristics of participants accessing services via Platform Providers using visual graphics and accessible tables. Please note that when we speak of characteristics, this is against a background of understanding that participants are not a homogenous group but are as richly variable in their characteristics as any community. We did however identify significant patterns that we thought important to share.

We also considered it important to share this data for the benefit of participants. Over the course of the Inquiry, we had many conversations with participants who wanted to understand what they may have had in common with others accessing services via Platform Providers. Some participants described a sense of isolation that appeared to relate to a general lack of information about who amongst participants are most active in this market.

A quick word about the data

The data relied on in this Inquiry came from a range of sources:

- NDIA and NDIS Commission informational holdings;
- Platform Providers (via section 56 notices and publicly available information);
- Inquiry consultation (online survey, direct consultation, submissions received);
- Relevant public source information.

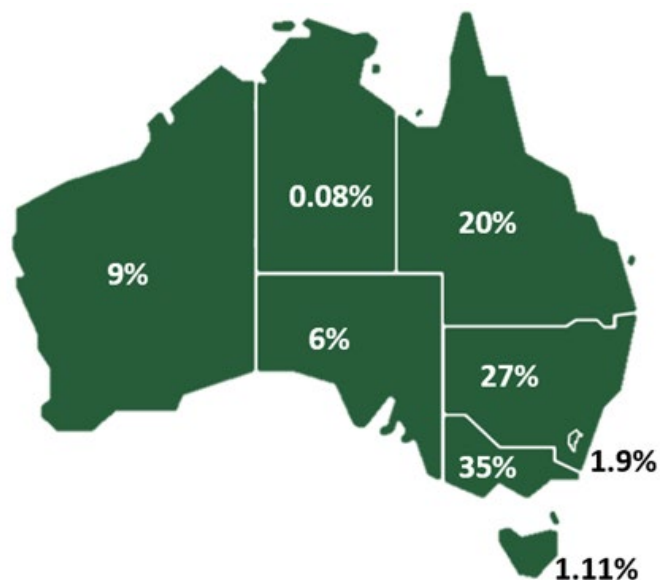
We identified 13,161 people with disabilities as having interacted with Platform Providers in the period 1 July 2022 to 31 December 2022. We then independently confirmed 98% of these people were active participants (12,865). We chose this data range as the information available during this period was the most comprehensive and matched the period applied by those Platform Providers who directly contributed information to assist the Inquiry. Information collected as part of the Inquiry enabled the further exploration and testing of the data collected and directly shaped learnings.

Participants engaging Platform Providers live in major cities in eastern States

Platform Provider participants by locations (%)

Location	%
Major Cities/Metropolitan Areas	87%
Regional Centres (population > 50K)	6%
Large Rural Towns (population 15K-50K)	3%
Medium Rural Towns (population 5K-15K)	2%
Small Rural Towns (population < 5K)	3%
Remote Communities	0.1%
Very Remote Communities	0.05%

Platform Provider participants by State/Territory (%)



Source: Data Supplement A – Participant Data

Platform Providers tend to be accessed by participants in metropolitan areas and in the Eastern states of Australia.

Participants from regional and remote areas who participated directly in the Inquiry told us that Platform Providers do not solve their service provision issues. Participants put this down to the availability of providers where they live. The data we collected confirms the challenges for participants in regional and remote.

We heard from some participants who advised they relocated to be closer to services, although their preference would have been to stay where they were originally located. As mentioned by a participant who lives with a physical disability:

“I have found good workers and get offers of help at short notice, but I live in an urban area, so I have a lot more choice than someone in a regional area”

The participants we consulted attribute this to a range of factors but most predominately, they reference a lack of workers located in their regions or willing to travel the distances required.

Plan Managed Participants

Nationally across the NDIS, 59% of participants are plan managed. Our data showed 65% of participants engaging services and supports via Platform Providers are plan managed. This tells us about the shape of the NDIS market, and how plan managed participants are accessing platform providers.

Fully self-managed participants are, surprisingly, underrepresented. Nationally across the NDIS scheme, 23% of participants are fully self-managed. When we looked at the proportion of participants engaging with Platform Providers, we identified just 17% who were fully self-managed.

A Plan Managed participant who accesses NDIS supports through a Platform Provider shared with us:

“Services and billing are smooth and fast.”

The following table compares the plan types of Platform Provider participants with participants nationally:

Plan Management Type	Platform Provider Participants	% Platform Provider Participants	% National Participants	Variance
Plan Managed	8,354	65%	58%	7%
Self-Managed Fully	2,217	17%	23%	-6%
Self-Managed Partly	1,498	12%	7%	5%
Agency Managed	771	6%	12%	-6%
Management Type Not Recorded	25	0.2%	0%	0.2%
Total	12865	100%	100%	0%

Source: Data Supplement A – Participant Data

Agency managed participants account for 6% of participants who receive services and supports via Platform Providers. This cohort, albeit small, particularly interested us as their providers of NDIS services and supports must be registered with the NDIS Commission. We were able to confirm the agency managed participants were receiving services from registered NDIS providers. This insight is worth highlighting for two reasons. The first is to show that where we identified information pointing to the possibility of non-compliance with regulatory requirements, we were able to conduct additional checks. The second is to highlight that some registered NDIS providers are also using Platform Providers to deliver services and perhaps reach a broader consumer base.

Primary Disability of Participants engaging with Platforms

It is important to note that many participants accessing NDIS services and supports have multiple disabilities. For the purposes of this Inquiry, we have limited our reporting to the primary disability identified for each participant in our dataset. The following graphic displays the primary disability type of participants engaging services via Platform Providers. We found this data highly informative which helped us to explore other contextual factors that may explain the data collected.

Primary Disability	Platform Provider Participants	% Platform Provider Participants	National Participants	% National Participants	Variance
Autism	3,592	28%	199,367	35%	-7%
Psychosocial Disability	2,470	19%	59,512	10%	9%
Intellectual Disability	2,007	16%	98,807	17%	-2%
Other Neurological	1,013	8%	21,811	4%	4%
Other Physical	673	5%	19,633	3%	2%
Acquired Brain Injury	568	4%	17,385	3%	1%
Cerebral Palsy	515	4%	17,468	3%	1%
Multiple Sclerosis	488	4%	9,938	2%	2%
Visual Impairment	463	4%	9,877	2%	2%
Stroke	330	3%	8,592	1%	1%
Spinal Cord Injury	227	2%	5,697	1%	1%
Other	220	2%	7,363	1%	0%
Developmental Delay	122	1%	56,811	10%	-9%
Hearing Impairment	97	1%	25,615	4%	-4%
Global Developmental Delay	49	0.4%	13,312	2%	-2%
Not Recorded	18	0.10%	0	0%	0%
Other Sensory/Speech	13	0.1%	2,154	0.4%	0.3%
Total	12,865	100%	573,342	100%	0%

Source: Data Supplement A – Participant Data

More insights related to level of function, age and culture

We explored a range of other characteristics participants engaging with Platform Providers share and compared this to all participants across Australia. Further insights relating to participants reported level of function, age and cultural demographic are of particular interest. It should be noted the data in this section of does not cover all the demographic information collected over the course of the Inquiry. More demographic information is available in the data pack supplement.

Participants with reported low level of function are overrepresented

The inquiry found participants engaging services via Platform Providers are diverse when it comes to their reported level of function (NDIS terminology).

Well over a third of participants receiving services and supports via Platform Providers have a reported low level of function (39%). This is 14% higher than the national proportion of participants in this category of reported function (25%). Nearly half (49%) of the participants engaging services through Platform Providers have reported a moderate level of function. Proportionately, this is 3% higher than number of participants nationally that fall within this group (46%).

While 29% of participants nationally have a high level of reported function, only 12% of participants engaging services and supports via platform providers appear to have a high level of reported function. There's more to explore about how participants in this group prefer to access and arrange their services and supports; however, it seems that participants with a high level of reported function are less likely to connect with Platform Providers.

Participants using Platform Providers are likely to be over 25 years of age

Children are, according to our data, less likely to be receiving services and supports via Platform Providers. Participants over 18 are more likely to engage services via Platform Providers. A quarter (25%) of Platform Provider participants are 18 and under, compared to half (51%) of participants nationally. The following table shows Platform Provider engagement by age and compares the prevalence of each age group to the number of participants in the same age group nationally.

Age Band	Platform Provider Participants	% Platform Provider Participants	National Participants	% National Participants	Variance
0 to 6	468	4%	92,368	16%	-12%
7 to 14	1,703	13%	149,734	26%	-13%
15 to 18	1,008	8%	48,138	8%	-1%
19 to 24	1,314	10%	46,948	8%	2%
25 to 34	1,724	13%	50,057	9%	5%
35 to 44	1,686	13%	45,056	8%	5%
45 to 54	1,970	15%	53,155	9%	6%
55 to 64	2,170	17%	63,074	11%	6%
65+	822	6%	24,812	4%	2%
Total	12,865	100%	573,342	100%	0%

Source: Data Supplement A – Participant Data

First Nations Participants

Participants who self-identify as First Nations Australians make up 7% of all participants. Our data showed that only 3% of participants receiving NDIS supports from Platform Providers are First Nations. The proportion of First Nations participants that engaged with the Inquiry via online survey also equated to 3% of participants, noting not everyone that completed the online survey provided demographic information.

Participants with culturally and linguistically diverse backgrounds

Nationally, 9% of participants are culturally and linguistically diverse (CALD). Our data showed that a total of 12% of participants engaging services via Platform Providers identify as CALD. A total of 8% of participants that provided demographic information via the survey identified they were CALD.

LGBTIQA+

Within the survey, 11% of participants who provided demographic information identified as LGBTIQA+. Through direct consultation, we heard that participants who identify as LGBTIQA+ appreciated the filtering function of Platform Providers which enabled them to easily engage with workers who were inclusive, supportive and respectful of their identity.

Participants use Platform Providers for assistance with personal activities and community participation

Most participants use Platform Providers to engage support with community participation and personal activities. More than half of the payments for services associated with registered Platform Providers were for assistance with personal activities (54.3%) followed by community participation (33%). The third highest payment type was for high intensity personal activities (6.7%).

Most participants will engage one person to deliver their supports

We wanted to understand how many different people and services participants engaged via Platform Providers. The data strongly reflected the experiences shared with us by participants. That is, most participants where possible, are looking to engage one reliable provider (64%) that is a good fit for their support needs while most other participants engage two (19%) or three (7%) people to deliver their services.

Of course, participants may decide to move on from a particular person (for any number of reasons) but we found they are unlikely to engage multiple people concurrently.

Why Participants are interested in what Platform Providers offer

In this section we explore the relationship between participants, Platform Providers and the people that deliver services to participants via Platform Providers. As we engaged in direct consultation sessions and read online surveys and submissions, the following themes emerged:

- Broadly speaking, Platform Providers are viewed as a practical and accessible way for participants to explore who may be available (and suitable) to deliver the services they need;
- Participants and the people that deliver services to them via Platform Providers largely lack confidence when it came to the nature of the contractual relationship(s), legal responsibilities and the role Platform Providers play;
- Participants want easy access to trustworthy and simple information that supports them to be savvy consumers of Platform Provider services;

Platform Providers connect participants with the people who can deliver the services they need

While some participants expressed a preference for a particular Platform Provider, many were simply focused on finding service relationships that were a good fit for them. This was highlighted by one participant in one of the consultation sessions who shared:

“You can be a great worker on any [Platform]”

When deciding which Platform Provider to choose, an impressive proportion of participants told us via the Inquiry’s online survey that they do their own research to identify Platform Providers (41% of 371 survey responses). Of the 371 survey responses, 15% said that support coordinators or plan managers engage with the Platform Provider to find suitable services and only 4% said there was a connection with a Platform Provider through some form of advertisement.

When asked about the benefits of accessing services through Platform Providers, 291 participant survey respondents identified 844 benefits. Of these, 40% were about exercising choice and control. This was followed by flexible access to services (21%). Quality and safeguarding were low on the list of benefits with only 6% of participants identifying this as a key benefit.

More than half of the participants that engaged with the online survey told us that they engage all or most of their NDIS services and supports via Platform Providers (54%). The participants that used Platform Providers occasionally to engage services was 21%. A total of 7% of participants told us they accessed services via Platform Providers when their regular supports were unavailable.

We often heard from participants that Platform Providers were great for booking “last minute jobs”, this was especially pertinent in one-off situations, such as support when travelling. As shared by a participant in Tasmania:

“If I’m travelling and it’s a choice between nobody or taking a worker with you (hugely expensive) that is where it [Platform Provider] works well. It can be a bit of potluck and like having a provider franchise - we can find you a worker when you travel but had no idea who was going to walk through that door but just that someone would.”

Finding the ‘right fit’ service usually means finding the ‘right fit’ person

Participants told us that they value the quality of their service relationships and expressed the greatest satisfaction in contexts where they felt heard, respected and valued. Participants described significant, whole of life benefits a good fit service relationship provides. As shared by a participant during an NSW consultation session:

“I pick a worker based on what I need with day-to-day stuff, it’s hit and miss but...can they do the work? Do they mesh? It depends on the person...what they’re comfortable doing, whether we get along, how we work together. When I find something that works, I stick with it.”

This sentiment was echoed by service providers who also expressed a greater sense of purpose and overall satisfaction in circumstances where they got along well with the participant and felt they were supporting them to achieve their plan goals in practical and real ways. The mutually beneficial relationship can be demonstrated by the experience shared by a participant:

“If I look forward to my support worker coming, then I know that’s a great service.”

Of course, finding the ‘right fit’ service starts with identifying what is available. We asked participants to identify factors they consider most important when choosing service providers. The following table shows the responses of 355 respondents:

Important Factors in Choosing Providers (%)	Don't Know	Not Important	Somewhat Important	Very Important	Total
Location	1%	2%	9%	87%	100%
Quality & Safeguarding Information	2%	3%	14%	82%	100%
Worker Information	2%	3%	15%	81%	100%
Skills & Specific Trainings	2%	6%	22%	70%	100%
Prices – Cost of accessing the Platform Provider	3%	5%	23%	69%	100%
Prices - Worker	4%	6%	28%	63%	100%
Training and Development	3%	8%	27%	62%	100%
Customer Ratings	3%	8%	35%	54%	100%
Registration Status	6%	23%	27%	45%	100%
Size of Provider	5%	39%	44%	12%	100%

Source: Data Supplement B – Survey Analysis

Relationship status – ‘it’s complicated’.

Our exploration of the service relationships between Platform Providers, participants and the people they engage started with asking participants to share their understanding. Participants (311 survey respondents) identified themselves within this relationship as:

Participants/Carers/Family View of Participants Role	NDIS Participant	Carer, Guardian or Family Member	Total	% Total
Consumer Receiving Service	73	77	150	48%
Consumer/Person hiring Independent Contractor	38	39	77	25%
Employer Hiring a Worker	36	18	54	17%
Other	12	18	30	10%
Total	159	152	311	100%

Source: Data Supplement B – Survey Analysis

We asked providers of services and received 306 responses. 244 respondents identified as service providers on a NDIS Platform Provider and 62 respondents identified as providers of services that are not on Platform Providers. The 306 respondents said:

Service Provider View of Role	Platform Provider Workers	Non-Platform Provider Workers	Total	% Total
Employee	184	31	215	70%
Sole Trader	42	13	55	18%
Contractor	14	7	21	7%
Business Owner	4	11	15	5%
Total	244	62	306	100%

Source: Data Supplement B – Survey Analysis

We found it concerning that the significant proportion of Participants and service providers considered the Platform Provider as the employer. What these responses indicated to us, and consultation conversations further confirmed, is that participants and the people they are engaging, do not have a clear understanding of their service relationship and how the Platform Provider fits in. This was demonstrated by the following quote from a participant in a consultation session:

“I don't want to be an employer, or run a 'service for one' (but may have to in order to ensure choice and control and the best quality service and life for my daughter) - I want to be my daughter's mother.”

From a safeguarding perspective it is simple

From a safeguarding perspective, regardless of how uncertain or complex the service relationships may be, our regulatory position is simple. The NDIS Code of Conduct applies to:

- Platform Providers
- Anyone delivering NDIS services and supports via a Platform Provider.

The NDIS Code of Conduct places obligations on Platform Providers, NDIS Providers and individuals (whether an NDIS Provider or worker) to:

- act with respect for individual rights to freedom of expression, self-determination, and decision-making in accordance with relevant laws and conventions
- respect the privacy of people with disability
- provide supports and services in a safe and competent manner with care and skill
- act with integrity, honesty, and transparency
- promptly take steps to raise and act on concerns about matters that might have an impact on the quality and safety of supports provided to people with disability
- take all reasonable steps to prevent and respond to all forms of violence, exploitation, neglect, and abuse of people with disability
- take all reasonable steps to prevent and respond to sexual misconduct.

The NDIS Code of Conduct obligations embody what participants described as ‘right fit’.

How Platform Providers operate in the NDIS Market

NDIS participants agreed and were adamant that there is a place for Platform Providers in the NDIS market and they need to continue to operate. In short, the 'self-service' model they offer suits many NDIS participants because, at least for those using Platform Providers, it is the most effective way to ensure they choose how their services and supports are delivered, and who delivers them.

We also heard the variability across Platform Providers can be overwhelming. Broadly, NDIS participants are keen to make informed decisions when choosing a Platform Provider. Many told us that they do their own research to identify the best Platform Provider for them based on the availability of the services they need and their location. Beyond that, we heard consistently that comparing Platform Providers is difficult for participants. As mentioned by an NDIS participant:

“I would like to see a compare the market type thing comparing all the Platform Providers. We need to see the comparison to discern the information quickly and be able to make decisions quickly...”

Another theme that arose from our consultations was the increasing interest from participants in Platform Providers operating in the NDIS market is not only about what they offer, but also about reflections on the kind of service enhancements or shifts NDIS participants would like traditional or more established providers to make.

One of the key issues for participants, discussed in more detail [here](#), is choosing who comes to their home to provide NDIS services and supports. Participants questioned why having a say about the individual(s) providing their supports should be a standard part of how services are delivered. As mentioned by a participant:

“Who wants half a dozen different people coming to their house on a regular basis? My husband (participant) finds it very confronting and confusing every day.”

Platform Providers also allowed for a level of flexibility around booking supports that is often unseen in other parts of the NDIS marketplace. Their cancellation policy largely supported participants to have more control over their own scheduling when compared to some other traditional providers. While we did hear that cancellation policies can vary and sometimes lean more in the favour of providers than participants, overall, participants considered this direct approach to engaging with their provider better than other service alternatives.

Finally, a theme echoed through the Inquiry, was the ease of accessing supports through a Platform Provider while traveling. Participants talked about their desires to travel, yet the additional cost to do so when you require complex supports is often a barrier. Platform Providers allowed participants to access service providers in most major cities without needing to complete a separate intake process. Largely, Platform Providers offer NDIS Participants the opportunity to choose who supports them, where and how. As highlight by a participant with an intellectual disability:

“...I use them for flexibility, I can get staff pretty much whenever I want wherever I want. I like the flexibility; I can talk directly to the person without having to go through a third party...”

What sets Platform Providers apart is that they offer a 'self-service' model. This was by far the most dominant theme described by NDIS participants when talking about the benefits of Platform Providers and why they have a place in the NDIS market.

When NDIS participants are talking about their services, it is important to note here that 87.3% of NDIS participant payments were for assistance with personal activities and community participation.

"I need to feel safe around the worker since they are coming into my home or transporting me."

Participants expressed it was essential to a good service experience that they feel safe and comfortable in the company of the people delivering their services.

Participants receiving assistance with daily personal needs also acknowledged how vulnerable or exposed they can be and how important it was that they felt respected. One participant summed this shared sentiment directly by commenting:

"I try and minimise the number of people that see me naked. So I really like long term workers. Someone who is willing to be with me for the long term."

Platform providers facilitate direct service connections that participants can shape to suit their goals, needs and circumstances. To participants, this approach to delivering personal and community access support seems to better facilitate their daily lives and has the flexibility to shift to accommodate the less predictable aspects of life that affect us all.

Participants carry a significant administrative burden

NDIS participants described the many hours they spend building online profiles, searching online platforms for potential service providers and executing careful planning to interview and trial potential service providers when using Platform Providers. The more we heard from NDIS participants about the administration and planning that goes into exploring and trialling new service connections, the more questions we had about the value of the 'add on' services offered by Platform Providers.

Participants who are aware of the limited safeguarding in place on most platforms described the extra steps they feel they need to take to ensure their services are to a standard they have a right to expect. Most participants however need to rely on previous poor experience and trust their gut will guide them well in finding providers who are the right fit for them.

Platform Providers allow participants to access thousands of workers at the touch of a screen. Participants said:

"It is not possible for technology to help you with trust (and) quality."

"No manager is keeping an eye on them, a lot of responsibility on us" and "Most workers on them significantly lack training, experience and basic skills."

Apart from offering insurance products (covered below), we noted some Platform Providers offer additional services such as access to training and education resources NDIS participants told us they saw the value in these training resources being offered but noted only some of them were compulsory. Some Platform Providers will take care of submitting invoices to the NDIA for services

provided to participants via their platforms. Invoicing services were referenced directly by a few NDIS participants as a value-add service.

Insurance products offered may not cover all providers and all service settings

It is common for Platform Providers to offer insurance protection to providers, at a cost, as part of the Platform service. Each NDIS Platform Provider decides if they will offer insurance, what it covers and who it applies to. Paying the additional fee for insurance protection may be compulsory or optional. Regardless of the context, it is important to consider whether the insurance offered provides coverage for the services to be delivered and what it may not cover. This is a time consuming but necessary exercise for providers because:

- Insurance products offered may not meet the individual needs of the provider;
- Insurance coverage may rely on the provider having certain qualifications; and
- Insurance may only apply to certain types of NDIS supports and services.

It is important for any providers purchasing insurance from Platform Providers to set aside the time to check whether it suits the services being delivered. We would also encourage those considering purchasing insurance from Platform Providers to compare these products to insurance products they could purchase directly. The insurance offered (or required) by Platform Provides might be good value and a perfect fit, but don't assume it will be.

Probity and background check services are variable and can be limited

Most opinions expressed by participants about the Platform Providers they use are largely informed by the quality of the individual worker they engaged. As one participant told us, *"You can be a great worker on any [platform]"*.

Participants shared that exercising choice and control to receive person-centred services and supports is achieved by finding workers whose values and experiences align with the participant's needs. For example, one participant from NSW shared:

"I pick a worker based on what I need with day to day stuff, it's hit and miss but...can they do the work? Do they mesh? It depends on the person...what they're comfortable doing, whether we get along, how we work together."

NDIS participants also told us they consider it essential that the person delivering their services and supports are subject to worker screening and other probity checks and expected the Platform Provider to manage this.

Pricing

Most Platform Providers state they are free to join. However, Platform Providers are likely to charge participants a fee to use the platform to book supports and services. This platform fee is separate to what worker's charge for their services. The platform fee may be charged to only the worker, only the participant or both. This is like downloading an 'app' onto your smart phone for free but then

being prompted to pay for specific features within that ‘app’. Platform Providers don’t make it easy for consumers to compare what is being offered on their sites. The table on the following pages show the most common pricing structures located on the platforms. This information was compiled by searching what each provider had available on their website in June 2023.

All information contained within this table has been accessed from the respective Platform Provider websites. . The separation between the provider and participant fee reflects when the fee is charged. However, all NDIS supports are funded by the participant funding provided through their NDIS packages. The fees are taken at different points, but both come from the participant funds. A more detailed table is available at [Data Supplement D](#).

Platform Provider	Fee Type	Provider fee	Participant fee	Notes
Assist Now	Membership fee	Not applicable	\$9 to \$45 per month	*Offer Pay-as-You-Go plans which vary in length and features.
Careseekers	Percentage of support cost (per hour)	9%	5%	*Agency managed participants attract a higher fee.
Find a Carer	Percentage of support cost (per booking)	Unclear – gateway charge	Range from 12.5% to 25%	
Five Good Friends	Membership fee (min 12 week membership)	Unclear	Unclear – different levels	*Participant membership fees are affected by the complexity of help required and case management.
Hire Up	Platform fee (per hour)	Unclear	Unclear	*The administration fee varies depending to time and date which the support is delivered.
HumDrum	Platform fee (per hour)	Unclear	Unclear	*The administration fee varies depending to time and date which the support is delivered.
Kynd	Percentage of support cost (per hour)	12%	N/A	Also provides the option to BYO relationship into the platform and fee decreases to 7%.
Like a Family	Platform fee (per hour)	Unclear	Unclear	*The administration fee varies depending to time and date which the support is delivered.
Mable	Percentage of support cost (per hour)	10%	7.95%	
Mobility	Percentage of support cost (per hour)	Unclear	Unclear	
SuitsMe	Platform fee (per hour)	Unclear	Unclear	*The administration fee varies depending to time and date which the support is delivered.
Support Network	Percentage of support cost (per hour)	0.02%	5%	
TappON	Percentage of support cost (per hour)	20%	Not applicable	

Participants say more needs to be done on safety and quality – and they are right

The NDIS Participants using Platform Providers who participated in this Inquiry were in broad agreement. They do the heavy lifting when it comes to ensuring their safety, evaluating service quality, and acting when things go wrong.

Safeguarding practices of Platform Providers are varied and often, insufficient. Background and probity checking practices undertaken by Platform Providers are variable. Agreements that participants are required to complete to sign up to platforms are complex and onerous. We heard concerning accounts relating to complaints and grievance processes and the handling of personal information. Platform Providers operating in the NDIS market can do more to ensure their platforms create safe spaces for NDIS participants and providers to connect. The data supplement to this report included information about complaints and reportable incidents.

Providers of services via Platform Providers also need to do better. Many providers delivering services do not understand that they are NDIS providers. Anyone delivering services via Platform Providers needs to understand the environment they work in, their service and conduct obligations and the potential consequences for failing to deliver services in a safe and competent manner. The few providers of services who are in a confirmed employment relationship are also bound by the same code and the regulatory consequences are the same. More needs to be done to, in effect, regulate the workforce of NDIS providers the Platform Provider market has created.

NDIS participants also described feeling commodified when engaging services via Platform Providers. We know this is a feeling described by NDIS participants in relation to NDIS services generally. In relation to Platform Providers the heavily marketed message is that NDIS participants and providers have autonomy over pricing. We also heard consistently from NDIS participants that providers always ask for and expect the highest possible rate that can be charged, regardless of skill and experience. We also know some Platform Providers set minimum hourly rates. What is marketed does not equal the experience for many participants. Increased visibility of pricing behaviour and better consumer resources for NDIS participants is required to address these issues.

Our overall observations are that more needs to be done to:

- Better support NDIS participants to make informed decisions as consumers of Platform Provider services.
- Establish a consistent and best practice approach to safeguarding across all Platform Provider services.
- Increase transparency around Platform Provider activities, starting with pricing.
- Regulate the workforce of NDIS providers the Platform Provider market has created more directly.
- Address the various privacy issues identified.

Background and probity checking offered by Platform Providers is variable

Platform Providers that are registered providers who engage the people (as employees or NDIS providers) that deliver services directly have strict obligations to meet which are set out in the *National Disability Insurance Scheme Act (2013)* (NDIS Act). The safeguarding practices unregistered Platform Providers have established is variable. Like in any service relationship, the safeguards in place should suit the service environment and NDIS participants can have an active role. NDIS participants expressed that they should be able to expect any person they engage across all Platform Providers to have had the same background and probity checks. NDIS participants also frequently added that this should be a market wide practice. Due to the uncertainty and variability of the safeguarding practices engaged in by Platform Providers, some NDIS participants felt the need to develop their own process to test whether the person they were considering engaging was safe. As mentioned by a participant:

“You need to go into ‘admin mode’ and screen the workers profiles.”

It is worth noting that some Platform Providers offer a suite of safeguards that, on their face, appear to signal to NDIS participants and workers engaging with this platform that background checking is conducted including verifying qualifications, verifying police and other screening checks. There does appear to be a reliance on the provider to submit the information required (which is to be expected) however the verification process conducted is uncertain. In relation to these Platform Providers, we could not identify with certainty whether any changes to a provider’s circumstances are actively monitored. NDIS participants may form the view that the people they engage are subject to thorough background and credential verification when this may not be the case. Any background or probity arrangements that do not build in independent verification and ongoing monitoring are, in our view, insufficient.

We also noticed that some Platform Providers do not appear to be taking advantage of the NDIS Worker Screening scheme. It could be that Platform Providers are not sufficiently aware of the scheme. It is also possible that Platform Providers avoid promoting use of the NDIS Worker Screening scheme because it would increase the visibility the NDIS Commission has of all the individuals linked to their platform.

Of course, only certain people are required to obtain and hold an NDIS Worker Screening Check Clearance. However, this nationally consistent and comprehensive screening scheme has been designed for the NDIS, is portable across all states, territories and work types and open to all NDIS providers and NDIS participants to use as part of their probity and safeguarding systems. We encourage NDIS participants and providers of services to consider the benefits of the NDIS Worker Screening scheme and build it into their service relationships if they are not already doing so.

When it came to engaging with Platform Providers to share a complaint, concern or grievance, we heard that overall, participants did not feel supported. As participants told us about their experiences there were common themes of feeling isolated and that Platform Providers were less interested in responding to their calls once they connected to the platform. Broadly, participants felt it was up to them to work through any issues with the provider. It concerned us to hear from some participants they felt “demonised” when they made a complaint to the Platform Provider and were threatened with being “kicked off” of the platform if they showed they were unhappy with the service. As mentioned by a participant:

“I was scared of repercussions, I dreaded every time she [support worker] came, I couldn’t cope emotionally.”

Over the course of the Inquiry NDIS participants did identify matters of concern that were referred to the NDIS Commission’s complaints team for further action. Complaints identified and referred are not included in this report or the data pack to ensure the processes have complete confidentiality.

Platform Providers hold highly sensitive personal information

In the current climate of data breaches, serious concerns were raised in relation to how Platform Providers collect and treat data. Platform Providers collect information of a highly sensitive and personal nature, and this applies to both participants and providers. Part of this collection of information would be to facilitate connections with providers, verify whether any limitations apply to the services an NDIS participant may receive (for example, whether the NDIS participant can only receive services from registered NDIS providers), and to mitigate and manage fraud risks. There are valid reasons for Platform Providers to collect personal and perhaps even sensitive information.

Over the course of the Inquiry, NDIS participants shared experiences relating to how Platform Providers handled their personal information that were cause for concern. Access to personal information, on request, was not consistently provided within reasonable time. We also heard examples of participants’ accounts being ‘closed’ without a sufficient explanation and not being provided with a copy of their personal information on request.

One participant shared the following experience:

‘I have also found issues with their data collection and storage. Although I did not mind giving them all of my details to become a member of the platform. Including my NDIS number to confirm with my plan management that I had appropriate funding available. When I requested for my account to be deleted, it was not. Months later, I began receiving spam email. That means they were holding onto all of my details. That is very valuable information they’re sitting on.’

Some Platform Providers offer a secure ‘chat’ function as part of their service. If a Platform Provider offers a ‘chat’ function as part of their service, NDIS participants and providers should assume those conversations are being closely monitored. From a safeguarding perspective, this is entirely appropriate and supported.

However, what we would expect to hear from NDIS participants is that Platform Providers took decisive action when inappropriate or offensive content was identified. Instead, we heard from NDIS participants that the purpose for some of this chat monitoring seemed more about protecting the financial interests of the Platform Provider than ensuring safety.

Particularly, participants spoke about chats being monitored to ensure that services were not accessed outside of the Platform Provider. As mentioned by a Participant:

“There is a clause [in the Platform provider agreement] that engaging workers outside of the platform is a breach for both participants and workers.”

We intend to explore the issues relating to use of personal and sensitive information by Platform Providers further. We also understand what we learned in the context of this Inquiry may apply to providers more broadly.

Regulating a workforce of NDIS providers

The operation of Platform Providers in the NDIS market has contributed to the expansion of NDIS providers. In other markets such as food delivery and transport, the people signing up to online platforms to pick up 'gigs' are generally referred to as 'workers'. In the NDIS market, the people signing up to Platform Providers to deliver services to NDIS participants are NDIS providers. The key difference is that gig services delivered in other markets are not funded by the public purse. While NDIS participants may have flexibility in relation to how they spend their NDIS funds, the NDIS is not a private enterprise and so the NDIS market is not your standard consumer industry.

Over the course of this Inquiry we identified that NDIS participants and the people providing their services are often confused or make incorrect assumptions about the service relationship. While there's more Platform Providers can do to clarify this, it is also likely that how gig type services and platforms work in other markets have had a strong influence on the perception in the NDIS market.

Adverse practical impacts for NDIS participants include the commodification of their service and support needs and an unacceptable variability in the quality of services they are accessing via Platform Providers. As one participant told us:

“You don't know who you are going to get until you've started working with them and their personality starts to come out, you can't get a good idea in a short meet and greet. I've also had support workers embellish themselves in the meet and greet and talk themselves up, and then not work to that standard.”

NDIS participants shared concerning accounts of how the gig economy culture in other markets is being applied to their service settings and making them feel like products not people or a means to accessing good and easy money. NDIS participants shared concerns around the lack of professionalism they had experienced and the absence of systems of accountability. As mentioned by a participant with an intellectual disability:

“[when trying to make a complaint] ... you get please leave a message and we'll get back to you but like, the generic responses that comes out from the human representative are more robotic. It's not transparent ...”

One participant described their NDIS provider consuming alcohol and then demanding to drive them home (because that was the service being provided). The community access setting, a horse racing event, lead the NDIS provider to consider it appropriate to behave in that manner. When the participant contacted the Platform Provider they did not pick up on the safeguarding issues for the participant and told the participant that the provider's job was to treat them the same as they would treat their friends on a weekend outing. The participant not only felt at risk on the drive home but felt undervalued and commodified.

While providers using Platform Providers to access NDIS participants include highly experienced providers, there is also a significant cohort of providers who are new to the NDIS market and new to delivering supports and services to people with disability. A study done by UNSW found that 42% of NDIS providers who had used an online platform to deliver services had less than 5 years of experience in the sector. In comparison, only 24% of NDIS providers who did **not** use a platform to deliver NDIS services had less than 5 years of experience (Cortis and Toorn, 2020). As mentioned by a participant:

“A lot of people make things up about what they have experience with, but in reality when you ask about their skills or qualifications they don’t have it – I doesn’t match up.”

NDIS participants expressed that they would benefit from knowing there was a ‘minimum standard’ for all service providers. NDIS participants did not express this should necessarily include formal training but should be effective in teaching new providers the values and behaviours that are expected in the delivery of services to people with disability. As mentioned by a participant:

“What I would love is for workers to be held accountable for quality around restrictive practices through a short and not complex accreditation course rather than having to be fully registered.”

Enhanced and direct visibility of all Platform Providers who are NDIS providers is essential

A key evidentiary challenge of this Inquiry related to gathering information from NDIS Platform Providers who are not registered with the Commission and then independently verifying that information. We had to rely on notices of requirement to obtain foundational information which has then been able to be verified against NDIA participant and payment claim data.

Even after completing this time consuming and heavily administrative process (for both the Platform Providers and us) we could not reliably identify the true cost of Platform Provider services. The practical consequence is that evaluating and monitoring the NDIS amounts Platform Providers receive for providing platform services is difficult. This impacts on our ability to comprehensively test whether Platform Providers offer a value for money service and whether the regulatory settings, currently available to be used to scrutinize Platform Providers, are right.

Platform Providers are in the unique position of facilitating service connections, receiving (often ongoing) fees for this service, yet not being identifiable as an NDIS provider drawing from an NDIS participants funds. In our view, while the NDIS market supports innovative approaches to the delivering of services and supports, there needs to be transparency across all service types to ensure NDIS Participants money for essential services and supports is being directed as intended.

We intend to consider ways to enhance visibility of Platform Provider activities, starting with more reliable visibility of the fees NDIS participants pay for platform services.