



**NDIS Quality  
and Safeguards  
Commission**

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Dear Ms Abhayratna

**Certification as Impact Analysis equivalent – NDIS provider registration reforms**

I am writing to the Office of Impact Analysis (OIA) to certify the reviews listed (Appendix A) with addition of supplementary analysis (Appendix B), have undertaken a process and analysis equivalent to an Impact Analysis (IA) for the development and delivery of the legislative changes to the *National Disability Insurance Scheme (Provider Registration and Practice Standards) Rules 2018* (NDIS Provider Registration Rules).

I certify that collectively these documents adequately address all seven IA questions and are submitted to the Office of Impact Analysis for the purpose of informing the introduction of mandatory NDIS registration for platform providers and supported independent living (SIL) providers. I note that our response to questions 1-3 is in addition to the reviews and reports that the OIA has previously advised can be put forward as an Impact Analysis Equivalent.

I am satisfied that the scope of the problem and the recommendations identified in the Impact Analysis Equivalents are substantially the same as the identified problem and recommendations in the proposed amendments to the NDIS Provider Registration Rules.

Implementation of the proposed amendments will lead to an increase in regulatory burden across the sector, however, these changes will proactively address quality, safeguarding and integrity risks identified through multiple reviews. The current registration requirements for platform providers and SIL providers has proven inadequate to date, with the proposed changes ensuring increased oversight of support provision.

The regulatory burden to business, community organisations or individuals is quantified using the Australian Government’s Regulatory Burden Measurement framework and is provided below. The methodology is comprehensively described in the supplementary analysis.

**Regulatory burden estimates (RBE) table for policy option 2**

Average annual regulatory costs (10 year average)				
Change in costs	Businesses	Community Organisations	Individuals	Total
SIL	\$2.59M	Nil	Nil	\$2.59M
Platform Providers	\$131,626	Nil	Nil	\$131,626
<b>Total</b>	<b>\$2.72M</b>	<b>Nil</b>	<b>Nil</b>	<b>\$2.72M</b>

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*Option 2: Average annual costs of implementing all mandatory registration and new registration conditions under an existing framework.*

Accordingly, I am satisfied that the attached report is consistent with the Australian Government Guide to Policy Impact Analysis.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Louise Glanville', written over a light grey rectangular background.

**Louise Glanville**  
Commissioner

24 April 2026

## Appendix A

### Reviews for certification

1. [Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability](#)
2. [Independent Review into the National Disability Insurance Scheme](#)
3. [NDIS Provider and Worker Registration Taskforce](#)
4. [NDIS Commission's Own Motion Inquiry into Aspects of Supported Accommodation](#)
5. [NDIS Commission's Own Motion Inquiry into how platform providers operate in the NDIS market](#)

## **Appendix B**

### **Impact Analysis Equivalent Supplementary Analysis**

See following page.



NDIS Quality  
and Safeguards  
Commission

# Impact Analysis Equivalent Supplementary Analysis

NDIS Provider Registration Rules  
changes

April 2026



## 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

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## Supplementary Impact Analysis

### 1. What is the problem you are trying to solve and what data is available?

Recent reviews and inquiries have revealed serious quality, safeguarding and integrity risks with platform providers and supported independent living (SIL). These findings emerge from the NDIS Quality and Safeguards Commission's (NDIS Commission) Own Motion Inquiries (OMI), the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability (Disability Royal Commission), the Independent Review into the NDIS (NDIS Review)<sup>1</sup> and the NDIS Provider and Worker Registration Taskforce (NDIS Taskforce<sup>2</sup>).

These major reviews have highlighted critical gaps in participant quality and safeguarding, including:

- The [Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability](#) revealed serious cases of abuse and neglect within the NDIS scheme and called for stronger regulation, especially in services involving personal care and accommodation.
- The [Independent Review into the National Disability Insurance Scheme](#), published in December 2023, identified the need for a more consistent approach to registration. Particularly, one that applies to all providers based on the level of risk involved, identified the need for a more consistent approach to registration.
- The [NDIS Provider and Worker Registration Taskforce](#), published in August 2024, identified some types of providers as higher risk. They proposed that all providers of Supported Independent Living (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.

Multiple reviews and inquiries including the Disability Royal Commission, the NDIS Review and the NDIS Provider and Worker Registration Taskforce have identified similar quality and safeguarding issues in the way certain SIL and Platform Provider services are being delivered, including risks to participants' safety and quality of care. These reviews have recommended strengthening oversight and regulation of SIL and platform providers to improve the quality and safety of these supports.

To address these critical concerns, the NDIS Commission is proposing several legislative changes as part of an initial set of reforms to the *National Disability Insurance Scheme (Provider Registration and Practice Standards) Rules 2018* (NDIS Provider Registration Rules). The rule making powers for these Rules have been delegated by the Minister for the NDIS to the NDIS Commissioner under section 201A of the *National Disability Insurance Scheme Act 2013* (NDIS Act) in the current instrument of delegation, *National Disability Insurance Scheme (Commissioner—National Disability Insurance Scheme rules) (Minister) Delegation 2025* (dated 24 November 2025).

The current regulatory oversight approach for SIL and platform providers, has proven inadequate in ensuring proper oversight of these supports. This has resulted in widespread issues including poor provider capability and inadequate safeguarding practices.

The NDIS Taskforce also emphasised a fundamental issue with the current approach:

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<sup>1</sup> Independent Review into the NDIS, 2023

<sup>2</sup> NDIS Provider and Worker Registration Taskforce Report, 2024

*Without registration, NDIS providers are not visible to the NDIS Commission or the [National Disability Insurance Agency] NDIA. This hinders market intervention when needed and reduces the regulatory intelligence available to improve market performance. The Taskforce heard from various stakeholders, including unregistered providers, that the NDIS Commission should have oversight of all providers under the Scheme ([NDIS Taskforce Advice](#), p 21).*

Further, the lack of regulation and monitoring of unregistered providers has directly contributed to safeguarding failures across the National Disability Insurance Scheme (NDIS):

*The lack of effective regulation and monitoring of services is a contributing factor in this violence and abuse, including through the lack of visibility and regulation of unregistered providers as well as a lack of effective regulation for registered providers. ([NDIS Taskforce Advice](#), p 22).*

The current regulatory gap undermines the NDIS Commission's ability to intervene and safeguard participants from harm. Unless legislative action is taken to strengthen oversight of SIL and Platform Provider services, these supports will remain vulnerable to provider misconduct, inadequate safeguarding and poor outcomes for people with disability.

The previous Minister for Government Services and the NDIS, the Hon Bill Shorten MP, announced on 16 September 2024 the mandatory registration of all platform providers, support coordinators and SIL providers as a priority, to strengthen the quality and safety of supports.

Subsequently, on 18 December 2025, Senator Jenny McAllister, Minister for the NDIS announced that mandatory registration for disability service providers in supported independent living (SIL), as well as platform providers, will commence from 1 July 2026.

## Supported Independent Living

SIL is a type of in-home support for people with higher support needs, who need a significant amount of help throughout the day, seven days a week, including overnight support. These supports are often delivered 24/7 in participants' homes and in shared living arrangements. SIL participants have an average NDIS plan budget of \$444,000, in the year ending 31 December 2025, which is significantly higher than the \$91,600 average for non-SIL participants. The Taskforce found evidence of providers exploiting participants such as targeting those with large plans, providing poor quality services, and in some cases, evicting participants once their funding had been exhausted.<sup>3</sup>

The NDIS Commission's [OMI into aspects of supported accommodation](#) (supported accommodation OMI) published in 2023, found specific concerns regarding quality and safety, and identified systemic issues in group home settings, including instances of violence, abuse and undue influence by support workers. It identified the need for specific regulation of these support arrangements to improve quality and safety, particularly regarding workforce capability and participants' ability to exercise choice and control. The supported accommodation OMI also found that 85% of all reportable incidents occurred in group home settings.<sup>4</sup> The closed nature of group home settings often leaves participants isolated from community and natural supports, with limited external oversight and difficulties in making complaints.<sup>5</sup>

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<sup>3</sup> NDIS Provider and Worker Registration Taskforce Report, 2024, p 49

<sup>4</sup> NDIS Commission Own Motion Inquiry into Aspects of Supported Accommodation in the NDIS, 2023, p 46

<sup>5</sup> NDIS Provider and Worker Registration Taskforce Report, 2024, p 29-30

The [NDIS Taskforce Advice](#), published in August 2024, identified some types of providers as higher risk. They proposed that all providers of SIL and home and living supports be registered within 12 months.

Consultations, combined with the supported accommodation OMI findings and advice from the NDIS Taskforce, have informed our proposed improvements to in-home supports in group living arrangements, where support is shared and settings where SIL is provided in smaller ratios of care, such as individual support provision.

### **SIL market data**

As outlined in Table 1, in Q2 financial year 2025-26, there were 35,928 participants accessing SIL from one of 7,032 providers, based on payments data. While 94% of participants received those supports from a registered provider (49% of this provider market), 6% of participants received supports from an unregistered provider (51% of this provider market). This means that over half of all SIL providers operate with limited regulatory oversight and suggests that many unregistered providers are likely small-scale operations, potentially including sole traders and partnerships.

*Table 1: Market distribution of SIL participants and providers - Q2 FY2025-26 (1 October to 31 December 2025).*

*Does **not** include Short Term Respite, Medium Term Accommodation, Individualised Living Options, and Assistance with Daily Life in an Aged Care Facility*

Registration Status	Payments (\$ million)	Participants	Providers
Registered	\$2,759.34(96%)	34,288 (94%)	3,470 (49%)
Unregistered	\$127.37 (4%)	2,301 (6%)	3,562 (51%)
<b>Total*</b>	\$2,886.71	35,928	7,032

*\*The participant total is a unique count of participants. Some participants received services and supports from both registered and unregistered providers and are therefore counted in both categories, but only once in the total. Furthermore, percentages for the registered and unregistered participants are calculated using the total unique count. As some participants received services and supports from both registered and unregistered providers, the combined percentages may exceed 100%.*

### **Platform Providers**

Platform providers are providers that use profile-based platforms via an app or a website, to connect NDIS participants with workers to deliver NDIS supports.

The [NDIS Commission’s Own Motion Inquiry into how platform providers operate in the NDIS market](#) (Platform Provider OMI) was published in 2023. During the Platform Provider OMI, the NDIS Commission consulted with close to 1,500 people, with 40% of those being people with disability. Participants reported 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

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the NDIS market. The Platform Provider OMI, uncovered circumstances where participants had negative experiences, felt commodified and were unable to have their complaints heard by their platform provider. Issues were raised relating to privacy and information sharing. The Platform Provider OMI found that participants and workers had a poor understanding of their service relationship, which impacted the delivery of safe and good services and that it was difficult for participants to understand the quality and value of the services provided. Analysis of payment data, undertaken for the Platform Provider OMI, indicated that 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%).<sup>6</sup>

An evaluation of the Platform Provider OMI was conducted by the NDIS Commission, with findings informing the [Platform Provider Mandatory Registration Consultation Paper](#) in 2024. Key findings include:

- The platform provider market continues to grow rapidly, including the size, number and complexity of providers and the number of NDIS participants accessing supports through platform providers.
- The Platform Provider OMI helped clarify understanding of obligations and expectations of platform providers. However, more oversight and a targeted approach to platform providers is needed to promote good and safe supports.
- A consistent approach to regulating platform providers across the NDIS Commission and engagement with other regulators is essential to addressing the issues identified in the Platform Provider OMI.
- “Gigification” is not unique to the NDIS, however the NDIS presents unique quality and safety challenges.

### ***Platform Provider market data***

As outlined in Table 2, in Q2 FY25-26, there were 132,860 active linked workers to the known 20 platform providers operating in the NDIS market. 63% of linked workers are linked to a registered platform provider and 37% of workers are linked to an unregistered provider (50% of this provider market).

10 providers (50% of the platform provider market) are registered to deliver at least one class of support. Of those 10, 8 are registered for classes of support that require a certification audit, while 2 are registered only for classes of supports that require a verification (desktop) audit. This shows just under half of all platform providers operate with limited regulatory oversight.

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<sup>6</sup> NDIS Commission Own Motion Inquiry into how Platform Providers operate in the NDIS Market, 2023, p 27-28

Table 2. Market distribution of platform providers - Q2 FY2025-26 (1 October 2025 to 31 December 2025)

Registration Status	Platform Providers	Active linked workers	Payments (\$ million)	Participants
Registered	10 (50%)	91,733 (69%)	\$85.22 (59%)	10,045 (45%)
Unregistered	10 (50%)	52,776 (40%)	\$60.30 (41%)	13,207 (59%)
<b>Total</b>	<b>20</b>	<b>132,860</b>	<b>\$145.52</b>	<b>22,553</b>

*\*The participant total is a unique count of participants. Some participants received services and supports from both registered and unregistered providers and are therefore counted in both categories, but only once in the total. Furthermore, percentages for the registered and unregistered participants are calculated using the total unique count. Because some participants received services and supports from both registered and unregistered providers, the combined percentages may exceed 100%.*

*\*\*The active linked workers total is a unique count of workers. Some workers delivered services and supports from both registered and unregistered providers and are therefore counted in both categories, but only once in the total. Furthermore, percentages for the registered and unregistered workers are calculated using the total unique count. Because some workers delivered services and supports from both registered and unregistered providers, the combined percentages may exceed 100%.*

*\*\*\*Registered providers are responsible for ensuring the information the NDIS Commission has about worker screening is kept up-to-date and accurate. Unregistered providers may also choose to link workers who have a worker screening.*

*\*\*\*\*Platform providers have been identified by the NDIS Commission in a manual search based on the definition of Platform Provider used in its Own Motion Inquiry.*

## 2. What are the objectives, why is government intervention needed to achieve them, and how will success be measured?

### The case for government intervention

The findings of the NDIS Review, Disability Royal Commission, NDIS Taskforce and several NDIS Commission inquiries have all identified systemic failures that cannot be addressed without regulatory intervention. With 51% of SIL providers and 50% of platform providers operating without registration, significant safeguarding gaps exist for people with disability receiving these supports.

The regulatory gap is particularly concerning given the vulnerability of many participants accessing these supports and the closed nature of many service environments. Reviews and inquiries have found that the power imbalance between providers and participants in these contexts means that reliance on participant choice alone is not enough to drive quality improvement.

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To address these concerns and regulatory gap, the NDIS Commission will introduce mandatory registration of SIL and platform providers as well as additional conditions on registration of platform providers. The introduction of mandatory registration will better safeguard participants and address concerns regarding the quality of higher risk NDIS supports and services by requiring SIL and platform providers to meet minimum quality and safeguarding standards.

## Key objectives

The primary goal of introducing mandatory registration and imposing conditions on registration is to better protect NDIS participants from harm and exploitation. These changes will address quality, safeguarding and integrity risks by requiring SIL and platform providers to lift quality, capability, and transparency.

Currently, unregistered providers can deliver services with limited oversight by the NDIS Commission, exposing participants to inconsistent service quality, unsafe conditions and financial mismanagement. These reforms will impose clear, enforceable requirements to be a registered provider to deliver these supports to address these gaps. This will increase participant safety, service quality and transparency for participants receiving higher-risk supports.

## The need for mandatory registration

The introduction of mandatory registration aims to safeguard participants and address concerns regarding the quality of services by requiring SIL and platform providers to meet minimum quality and safeguarding standards. Key goals of mandatory registration include:

- Stronger safeguards: ensuring all providers meet minimum standards and are subject to regulatory oversight.
- Improved quality and consistency: setting clear expectations for provider competence.
- Greater transparency and accountability: giving the NDIS Commission better visibility of who is delivering services and an increased accountability of services delivered via platforms.

Participants accessing SIL are at a significantly higher risk of harm due to the closed nature of group home settings. Given the safety risks highlighted, the Government announced that mandatory registration will be introduced for SIL as a priority, consistent with the recent findings of the NDIS Taskforce which recommended urgent registration of SIL and home and living supports under the existing registration framework.<sup>7</sup>

As more participants are now accessing supports through platforms, there is a clear need to address challenges. 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 in the NDIS Act or NDIS Rules. Defining platform providers and requiring them to be registered will support a better and consistent understanding of platform provider, worker and participant roles and responsibilities.

Mandatory registration of SIL and platform providers is a key step towards strengthening the oversight of these market segments to ensure the services and supports are safe and of high quality.

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<sup>7</sup> NDIS Provider and Worker Registration Taskforce Report, 2024, p 5

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## Success measures

Success will be measured through quantitative and qualitative indicators including:

### Participant safeguarding and outcomes

- Reduction in harm and improved safety for participants engaging with higher-risk supports
- Improved participant experience and adherence to the quality expectations set out in NDIS Practice Standards
- Better identification and management of emerging compliance and risk trends.

### Provider quality and compliance

- Percentage of previously unregistered providers successfully registered
- Compliance with NDIS Practice Standards and Quality Indicators
- Improved provider capability to deliver quality supports.

### Financial integrity

- Improved provider accountability through strengthened oversight.

### Regulatory transparency

- Improved visibility of provider activity
- Strengthened regulatory decision making through audit data.

## 3. What policy options are you considering?

There are three policy options for consideration.

### Option 1: Maintain the current voluntary registration process for SIL and platform providers (status quo)

By maintaining the current voluntary registration process for SIL and platform providers, unregistered providers would continue to operate with limited NDIS Commission oversight, with the NDIS Code of Conduct as a minimum requirement to adhere to.

Recent reviews informed by subsequent public consultations, have indicated that the status quo should not continue. The NDIS Review highlighted that registration is currently only mandatory for a limited number of higher-risk support types, and that the market of unregistered providers is larger than originally expected:

*Unregistered providers are not required to meet any specific standards beyond the basic expectations in the NDIS Code of Conduct.... This means that there are many providers 'flying below the radar' with limited regulatory oversight. This leaves participants potentially exposed to risk — particularly those who have complex needs or circumstances. ([NDIS Review Final Report](#), p 207-208)*

The Disability Royal Commission and NDIS Commission's Own Motion Inquiry into Aspects of Supported Accommodation identified systemic issues of violence, abuse and undue influence by

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support workers in group home settings. Further oversight through mechanisms like mandatory registration has been a consistent recommendation.

The current registration requirements do not define platforms or recognise their role in linking participants and supports. Without greater clarity on the function of platform providers, ambiguity of the roles and responsibilities of the platform, worker and participant will continue.

## **Option 2: Implement mandatory registration and registration conditions under existing framework (preferred option)**

Strengthening quality and safeguards for NDIS participants through implementing mandatory registration requirements for all SIL and platform providers was announced by Senator Jenny McAllister, Minister for the NDIS, on 18 December 2025.

Implementing mandatory registration and new registration conditions would address the recommendations from recent reviews and reports calling for stronger oversight and regulation of these higher-risk supports. The NDIS Taskforce, recognising the significant risks posed by SIL supports, recommended registration for SIL as a priority. Similarly, the Disability Royal Commission and NDIS Review emphasised the importance of registration as a safeguard for people with disability.

*Provider registration is a critical safeguard for people with disability. It gives the NDIS Quality and Safeguards Commission (NDIS Commission) more information about the quality and safety of a provider's service delivery. Limited regulation and oversight of unregistered providers can pose safety risks to people with disability ([Disability Royal Commission Disability Services Final report - Volume 10](#), p 317).*

Additionally, the evaluation of the Platform Provider OMI published in the Platform Provider mandatory registration consultation paper identified that a consistent approach to regulating platform providers across the NDIS Commission is essential to addressing the issues identified. These issues include inconsistent and insufficient safeguards, absence of worker suitability and qualification checks, poor understanding of rights and responsibilities, misuse of personal information, and overpricing of services and supports.

### ***SIL registration conditions***

Currently SIL supports fall under the 'assistance with daily life tasks in a group or shared living arrangement' class of support (0115) under the NDIS Provider Registration Rules. There are also supports other than SIL that fall within class 0115 such as Short-Term Accommodation and Assistance, Medium Term Accommodation and Individualised Living Options. Costs for SIL may be claimed across several support categories, but the default is 0115 class of support: Assistance with daily life tasks in group or shared living arrangements.

To implement mandatory registration for SIL, a new class of support called *Assistance with Supported Independent Living* will be created, with all providers delivering SIL supports under this category required to be registered. This will reduce the SIL cohort for mandatory registration to mostly group living arrangements, where supports are shared, it will also include those settings where SIL is provided in smaller ratios of care. It will minimise disruption of arrangements in other home and living settings claimed under support category 0115, consistent with the policy settings enabled by the NDIA's price arrangements and pricing limits and SIL operational guidelines.

### **Platform provider registration conditions**

The registration conditions for platform providers have been designed based on consultation with participants, providers, other Government Agencies and the disability community more broadly.

Defining platform providers and requiring them to be registered will support a consistent understanding of platform providers, their workforce and participant roles and responsibilities. It is proposed that the NDIS Commission will amend section 7 of the NDIS Provider Registration Rules to include a mandatory requirement for providers to be registered where operating a 'NDIS digital platform'. Providers who meet the definition of a 'NDIS digital platform' will be required to register for 'NDIS digital platform service' (a new class of support). This class of support will require a certification audit against the core module of the NDIS Practice Standards. The proposed definition has been adapted from the definition of 'aged care digital platform'.

The following conditions of registration is also proposed to be introduced for 'NDIS digital platforms services':

1. NDIS digital platform service providers to only allow providers and workers to use the NDIS digital platform who have undertaken a NDIS worker screening check.
2. NDIS digital platform service providers to check and display the following information on their NDIS digital platform:
  - banning orders;
  - credentials or qualifications that are stated by the provider or worker on the NDIS digital platform;
  - NDIS worker screening check for workers;
  - general information about the processes undertaken in order to check the provider or worker's banning orders, credentials or qualifications and NDIS worker screening check for workers.

There will be a mechanism that will allow the exclusion of mainstream platform providers (e.g. rideshare, maintenance platforms) from the requirement to be registered.

During consultation, it was raised the importance of aligning the obligation of platform providers with obligations for operators of aged care digital platforms under the new Aged Care Act, due to many providers operating across both NDIS and Aged Care. Aged care digital platforms have obligations to check and display information relating to compliance with applicable worker screening requirements, the credentials or qualifications that are stated on the Aged Care digital platform and general information about the processes undertaken in order to check an entity's credentials or qualification.<sup>8</sup>

### **Option 3: Await design and implementation of future reform**

The NDIS Review and NDIS Taskforce have recommended implementing a Graduated Risk Proportionate Regulatory Model (stated as regulatory model or graduated risk proportionate model). The Disability Royal Commission also recommended increased proportionate regulatory requirements. The Graduated Risk Proportionate Regulatory Model would introduce changes to registration categories to support tailored regulation based on risk.

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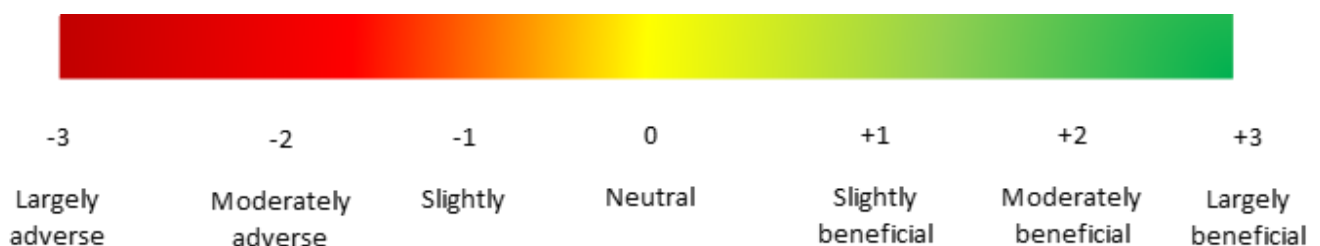
<sup>8</sup> [Aged Care Act 2024 - Federal Register of Legislation](#)

Each registration category outlines specific regulatory requirements and associated obligations that respond to emerging and long-standing quality and safety issues. However, designing and implementing the recommended regulatory model will be complex, will likely take several years to develop, and is subject to Government decisions and approvals. Option 2 allows for mandatory registration and registration conditions under the existing framework, which is also able to be considered in any future state regulatory model.

Deferring implementation of mandatory registration until such time, as the broader Graduated Risk Proportionate Regulatory Model is developed, would maintain the status quo in the interim period, continuing to leave participants in these higher-risk settings without any additional safeguards.

#### 4. What is the likely net benefit of each option?

A multicriteria analysis (MCA) has been undertaken to evaluate the three policy options being considered. The MCA uses a sliding scale for scoring with largely adverse impacts to stakeholders being rated as -3 and largely beneficial impacts to stakeholders being rated as +3.



Given the complex nature of the NDIS market and the interplay of social, economic and regulatory factors, many of the most significant benefits of these reforms are difficult to quantify in fiscal terms. The human cost of exploitation, abuse and poor service quality experienced by participants cannot be adequately captured purely through quantitative methods. The full benefits may not be realised until changes have been fully implemented and may, in any case, be preventative in nature.

## Multicriteria analysis – impact on stakeholders

Table 3: MCA overall impact of options on stakeholders.

Stakeholder	Reform option rating		
	Option 1: Status quo	Option 2: Mandatory registration and registration conditions under existing framework	Option 3: Await future reform
NDIS participants	-3	+3	-1
Carers, supporters and families	-2	+2	-1
Service providers	0	-1	-1
Net benefit score	-5	+4	-3

Based on the summation of the ratings, option 1 is likely to have a negative net impact of -5, primarily harming participants and their support networks. Option 2 has a positive net impact of +4, benefiting participants, carers, supporters and families despite some costs to providers. Option 3 is likely to have a negative net impact of -3 due to timing constraints, with moderate negative impacts for most stakeholders.

While option 2 creates moderately adverse impacts for service providers, these are outweighed by the moderately to largely beneficial impacts for NDIS participants, and their carers, supporters and families.

## Multicriteria analysis - impact against reform objectives

Table 4 below provides an estimate of the benefits for each of the 3 options against the reform objectives detailed in question 2. This assessment considers both immediate and long-term impacts, with particular attention to the vulnerability of participants in higher-risk support settings. The criteria have been weighted equally in this analysis, recognising that participant safety, service quality, governance and transparency are all fundamental to an effective disability support system. This analysis focuses on the outcomes for participants and the integrity of the NDIS Scheme, rather than administrative burden.

Table 4: MCA overall impact of options against reform objectives.

Criteria	Reform option rating		
	Option 1: Status quo	Option 2: Mandatory registration and registration conditions under existing framework	Option 3: Await future reform
Participant safeguarding and outcomes	-3	+2	-2
Provider quality and compliance	-2	+2	-1
Financial integrity	-2	+1	-1
Regulatory transparency	-1	+1	0
Net benefit score	-8	+6	-4

#### *Participant safeguarding and outcomes*

Option 1 leaves participants significantly exposed to harm, particularly in closed settings where oversight is limited. This approach receives a -3 score as multiple reviews, including the Disability Royal Commission, have documented extensive evidence of violence, abuse and neglect occurring in these settings. With 51% of SIL providers and 50% of platform providers operating without registration, participants remain vulnerable to poor practices without adequate safeguards. Option 2 would substantially improve participant protection through compliance expectations with minimum quality standards, as outlined in the core module Practice Standards and supplementary Practice Standards for providers registered to deliver SIL supports. This approach directly implements the recommendations made by the NDIS Taskforce, the Disability Royal Commission and various consultations. Whilst the eventual regulatory model outlined in option 3 may offer tailored safeguards, it would extend the current risk exposure for several years as it undergoes design and implementation.

#### *Provider quality and compliance*

Option 1 will continue to perpetuate widespread quality inconsistencies. Unregistered providers are only required to meet the NDIS Code of Conduct requirements, creating a system where participants often receive support from unregistered providers without enforceable quality assurance mechanisms. Option 2 would establish consistent quality expectations for all SIL and platform providers that will further improve service quality outcomes for participants and strengthen provider capability. Option 3 could eventually introduce appropriate, risk-based requirements however maintains current inconsistencies during the development phase.

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### ***Financial integrity***

Option 1 has allowed serious financial mismanagement issues to develop, such as evidence of SIL providers targeting participants with large plans. Option 2 introduces important safeguards that protect participant choice and control and reduces opportunities for providers to exercise undue influence over participants. Option 3 would allow problematic financial practices to continue during the extended design and transitional timeframe to the new model.

### ***Regulatory transparency***

Option 1 limits visibility of unregistered providers, hindering intervention by the NDIS Commission when problems arise. Option 2 creates visibility of all SIL and platform providers to develop and maintain any conflicts of interest. Option 3 neither improves nor worsens transparency in the near term, resulting in a neutral score.

Based on this analysis, option 2 achieves a positive score of +6, representing beneficial outcomes across all key reform objectives and provides the highest level of positive impact to affected stakeholders.

### **Regulatory Burden Estimate**

The Regulatory Burden Estimate (RBE) follows the guidance and costings advice provided by the Office of Impact Analysis (OIA). As per the guidelines of the OIA, costs presented will not significantly vary over time and the impact of the change in the first year can be treated as the average impact of change to the sector. The NDIS Commission intends to continue providing registration at no cost to providers, however, is aware that there are costs associated in obtaining registration.

Providers of NDIS supports incur regulatory and other costs, including the cost of undertaking an independent third-party audit and costs associated with ensuring quality and safety of supports for people with disability. These may include professional registration (in the case of specialised services, like therapeutic supports), professional development for workers, working with children checks and NDIS worker screening checks.

The regulatory reform of the proposed measures is expected to affect providers in different ways, depending on the size of their organisation, their current registration or non-registration status and other factors. Costs associated with acquiring and maintaining registration have been considered in the calculation of the regulatory burden for NDIS providers (businesses), community and individuals (NDIS participants). Further explanation on the costs, including data sources and limitations of the regulatory burden estimate developed, have been summarised in the section below.

### ***Regulatory Burden Estimate for Option 1 and 3***

As outlined in question 3, option 1 proposes no change to the market. Therefore, the current voluntary registration process and registration conditions for SIL and platform providers would be maintained. On the other hand, option 3 defers implementation of mandatory registration, until a broader Graduated Risk Proportionate Regulatory Model is developed.

Both option 1 and 3 would maintain the status quo either in the long term or the interim period until further policy change. As already outlined in the paper, this would continue to leave participants in higher-risk settings without any additional safeguards.

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As option 1 and 3 have no immediate changes to the sector, no additional costs would be incurred by providers, participants or the community.

### ***Regulatory Burden Estimate for Option 2 (preferred option)***

The RBE for the preferred option, option 2, is outlined for the reform areas detailed in this proposal – SIL and platform providers.

In the calculation of the regulatory burden costs, the RBE includes the following factors:

- Administrative costs: including cost estimates of administrative functions relating to notifications to the NDIS Commission of certain activities, linkage of workers with worker screening clearances and costs associated with undertaking audits.
- Substantive costs: including substantive cost estimates of functions related to meeting regulatory requirements, such as providing training to employees to meet regulatory and compliance requirements.
- Delay costs: application and approval delays, which may occur when undertaking worker screening checks, preventing a worker from working for a registered provider while they are waiting for the outcome of their application. There will also be delay costs in future, beyond transitional arrangements, for SIL and Platform Providers who apply for registration and must wait for a quality audit and for their application to be determined before they can deliver SIL or Platform Provider services and supports. As at Quarter 2, 2025-26, new certification applications for registration were decided in 47 days (median). The days to decide have been trending rapidly downward since July 2024, and will continue to minimise delay impacts. While NDIS payment data is available, there is no available data on provider profit margins to determine the cost of a pending registration decision.

The following assumptions have been relied on when developing the model, including:

- The changes proposed will have no direct regulatory impact or costs to participants (individuals) or the community.
- Currently, platform providers are not required to be registered with the NDIS Commission. Those platform providers who are registered with the NDIS Commission only apply to be registered for the specific class/es of support delivered using their platform.
- Data collected relies on the number of reportable incident notifications made to identify the level of regulatory burden. These incident reports are not directly linked to specific roles within a provider organisation, rather to the NDIS Commission's unique registration identification number of the business. As such, the number of reports is an estimate of the average numbers of reports expected to be submitted by a provider.
- The number of workers per SIL provider size category has been estimated based on distribution of payment and number of participant data, and market analysis, including the NDS Workforce Census Report 2024.<sup>9</sup>

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<sup>9</sup> [NDS Workforce Census Report 2024.pdf](#) p 5.

- Administrative and substantive compliance costs are variable; therefore, an estimated value of duration has been allocated.
- State and Territory Worker Screening Units, who conduct screening checks on behalf of the NDIS Commission, have provided their application delay times. As providers are not bound by geographical locations, the average national application delay time for worker screening checks has been used. No card no start requirements exist only in Queensland, South Australia and Victoria. The proportion of screened workers in these jurisdictions (58.6%) versus nationally has been used to calculate the delay costs.
- The NDIS Commission does not control audit pricing. The cost of an audit is assessed by an approved quality auditor, based on the size and scale of the organisation. The average cost of a certification audit has been used.
- The regulatory burden measurements are calculated on a ten-year bases.

The total 10 year costs outlined in the Tables 5 and 7 below are calculated using the OIA Regulatory Burden Measurement Framework and considers the limitations and guidelines above. The default labour costs for business or community organisations are based on the recommended rate by the OIA at \$48.67 per hour.

## Supported Independent Living - Regulatory Burden Estimate

Table 5: RBE resulting from policy option 2 for Supported Independent Living (SIL)

Regulatory changes to Supported Independent Living (SIL)			
Regulatory Costs to Individual (NDIS Participants)		OIA RBE Formula	Total
Administrative Costs	Nil	Time required x Labour cost x Times performed x Number of individuals	\$0.00
Substantive Compliance Costs	Nil	Time required x Labour cost x Times performed x Number of individuals	\$0.00
Delay Costs	Nil	Time required x Labour cost x Times performed x Number of individuals	\$0.00
<b>Total participant cost</b>			<b>\$0.00</b>
Regulatory Costs to Business (NDIS Providers) <i>Impacted providers – 3,562</i>		OIA RBE Formula	Total
Administrative Costs	- Costs of notifying the NDIS Commission of certain activities - Costs of undertaking a third-party audit	Time required x Labour cost x Times performed x Number of providers x 10 years for ongoing costs	CAL: (\$48.67 p/h x hrs to complete) x (estimated proportion of records x number of providers) + average certification audit costs

	- Cost associated with a worker screening check		Total = \$19,915,934.13
<b>Substantive Compliance Costs</b>	- Costs of providing training to employees to meet regulatory requirements	Time required x Labour cost x Annual times performed x Number of providers x 10 years for ongoing costs	CAL: (\$48.67 p/h x 0.2 hrs to complete) x (estimated proportion of records x number of providers) Total = \$95,132.91 \$951,329.13
<b>Delay Costs</b>	- Reportable Incident approval delay	Time required x Labour cost x Annual times performed x Number of providers x 10 years for ongoing costs	CAL: (\$48.67 p/h x 0.1 hrs to complete) x (estimated number of records x number of providers) Total = \$475,664.56
	- Worker screening security clearance average national application delay	Time required x Labour cost x Times performed x Number of providers x proportion of no card no start states	CAL: (\$48.67 p/h x 0.1 hrs to complete) x (estimated days delayed) x (estimated number of records) x (number of providers) Total = \$4,575,548.81
<b>Total provider cost</b>			\$25,918,476.63
<b>Regulatory Costs to Community</b>		<b>OIA RBE Formula</b>	<b>Total</b>
<b>Administrative Costs</b>	Nil	Time required x Labour cost x Times performed x Number of individuals	\$0.00
<b>Substantive Compliance Costs</b>	Nil	Time required x Labour cost x Times performed x Number of individuals	\$0.00
<b>Delay Costs</b>	Nil	Time required x Labour cost x Times performed x Number of individuals	\$0.00
<b>Total community cost</b>			\$0.00
<b>Total RBE cost</b>			<b>\$25,918,476.63</b>
<b>Annual average RBE cost</b>			<b>\$2,591,847.66</b>

The proposed regulatory changes outlined in option 2 will impact 2,301 participants and 3,562 unregistered SIL providers. They represent 51% of the providers impacted by the change outlined in

option 2 (SIL providers). The 3,562 SIL providers support 2,301 participants who represent 6% of participants accessing SIL supports. Some participants may receive support from multiple SIL providers, which could include more than one unregistered provider or a combination of registered and unregistered providers.

As demonstrated in Table 5, there is no additional cost to participants and the community by the implementation of the proposed regulatory change under option 2. The estimated regulatory burden for the 3,562 impacted SIL providers is an annual average of \$2.59 million, representing an estimated annual average cost per provider of \$794.56.

The majority of the providers impacted by the proposed measures are extra small and small providers with quarterly payments under \$250,000 (85%). Based on the average SIL participant plan of \$444,000, it is anticipated that many of the unregistered providers would be providing supports to 1 participant, and many participants would be engaging more than one SIL provider. It is assumed that part of the reason for this is that the current market has a higher proportion of medium and large providers already registered via the certification process.

Actual cost per provider will fluctuate depending on size due to smaller providers having a proportionately smaller workforce and less participants, resulting in lower workforce related regulatory burden activities, audit costs and reportable incidents. Small providers are still likely to be impacted by the regulatory burden and be in a limited financial position to meet the same minimum benchmarks as medium and large providers. The analysis has shown that majority of the small providers are delivering unregistered SIL supports. The registered SIL market includes a sizable proportion of large providers who support the majority of participants (94%) accessing this type of support.

As shown by the distributional analysis on Table 6, most of the unregistered SIL providers are categorised as small or extra small providers. These providers have less participants and less workers than the larger SIL providers meaning that they would have smaller reportable incident, worker and audit costs.

*Table 6: Unregistered SIL providers distributed by size - Q2 FY2025-26 (1 October 2025 to 31 December 2025)*

Provider Size (Total Quarterly Payments)	Providers in Category	Payments to Providers \$ Millions
Large (>\$2.5M)	17 (0.5%)	\$4.17 (3%)
Medium (>\$250,000 - ≤\$2.5M)	528 (15%)	\$63.51 (50%)
Small (>\$25,000 - ≤\$250,000)	1,497 (42%)	\$49.27 (39%)
Extra Small (≤\$25,000)	1,520 (43%)	\$10.42 (8%)
<b>Total</b>	<b>3,562</b>	<b>\$127.37</b>

## Platform Provider - Regulatory Burden Estimate

Table 7. RBE resulting from policy option 2 for Platform Provider

Regulatory changes to platform providers			
Regulatory Costs to Individual (NDIS Participants)		OIA RBE Formula	Total
Administrative Costs	Nil	Time required x Labour cost x Times performed x Number of individuals	\$0.00
Substantive Compliance Costs	Nil	Time required x Labour cost x Times performed x Number of individuals	\$0.00
Delay Costs	Nil	Time required x Labour cost x Times performed x Number of individuals	\$0.00
<b>Total participant cost</b>			<b>\$0.00</b>
Regulatory Costs to Business (NDIS Providers) Impacted providers – 20		OIA RBE Formula	Total
Administrative Costs	<ul style="list-style-type: none"> <li>- Costs of making, keeping and providing records</li> <li>- Costs of notifying the NDIS Commission of certain activities</li> <li>- Costs of undertaking a third-party audit</li> <li>- Cost associated with a worker screening check (where applicable)</li> </ul>	Time required x Labour cost x Times performed x Number of providers x 10 years for ongoing costs	CAL: (\$48.67 p/h x hrs to complete) x (estimated proportion of participant reports) + average certification audit costs Total = \$260,749.35
Substantive Compliance Costs	<ul style="list-style-type: none"> <li>- Costs of providing training to employees to meet regulatory requirements</li> </ul>	Time required x Labour cost x Times performed x Number of providers x 10 years for ongoing costs	CAL: (\$48.67 p/h x hrs to complete) x (estimated proportion of participant reports) Total = \$104,221.90
Delay Costs	<ul style="list-style-type: none"> <li>- Approval delay – Worker screening Security Clearance</li> </ul>	Time required x Labour cost x Times performed x Number of providers	CAL: (\$48.67 p/h x hrs to complete online provider/worker linking) x (estimated number of screens) Total = \$951,293.58

<b>Total provider cost</b>			<b>\$1,316,264.83</b>
<b>Regulatory Costs to Community</b>		<b>OIA RBE Formula</b>	<b>Total</b>
<b>Administrative Costs</b>	Nil	Time required x Labour cost x Times performed x Number of individuals	\$0.00
<b>Substantive Compliance Costs</b>	Nil	Time required x Labour cost x Times performed x Number of individuals	\$0.00
<b>Delay Costs</b>	Nil	Time required x Labour cost x Times performed x Number of individuals	\$0.00
<b>Total community cost</b>			\$0.00
<b>Total RBE cost</b>			<b>\$1,316,264.83</b>
<b>Annual average cost</b>			<b>\$131,626.48</b>

The proposed regulatory changes outlined in option 2 will impact 20 platform providers. The 20 platform providers support 22,553 participants. Some participants may receive support from multiple platform providers, however they have only been counted once.

Mandatory Registration impact on providers currently registered under other categories of support via certification audit

8 of 10 providers who are registered to deliver other categories of supports have done so via certification audit and therefore their registration can be varied to include a digital platform service without requiring a new audit.

Mandatory registration impact on currently unregistered providers and those providers registered under other categories of support via verification audit

Unregistered providers will be required to be registered via a certification audit against the core module. Those providers who are currently registered and have only undertaken a verification audit, will need to vary their registration resulting in them having to undertake a certification audit against the core module.

Impacts of new conditions of registration

Platform providers will need to ensure they only allow providers and workers to use their NDIS digital platform who have undertaken a NDIS worker screening check.

Registered Providers are already required to ensure workers in a [risk-assessed role](#) or [key personnel role](#) have NDIS worker screening clearance and comply with the core module of the NDIS Practice Standards.

All providers whether registered or unregistered, including platform providers, have an obligation under the Code of Conduct to:

- provide supports and services in a safe and competent manner with care and skill,

- 
- act with integrity, honesty, and transparency.

The condition on registration for NDIS digital platform service providers to check and display the information, seeks to strengthen these obligations, by providing information about the processes undertaken in order to check the provider or worker's, credentials or qualifications.

As demonstrated in Table 7 above, there is no additional cost to participants and the community by the implementation of the proposed regulatory change under option 2. However, across the known Platform Providers market, the estimated annual average regulatory burden is \$131,626.48. The cost to individual business would vary depending on Platform Provider size, existing Platform Provider registration status and worker screening cost to providers and workers on the platform.

## **Regulatory impacts on key stakeholders (option 2)**

### ***Regulatory impacts on participants (individuals) and the community***

None of the options proposed will have a regulatory burden impact on participants (individuals who participate in the NDIS scheme). Although we expect some providers to exit the market following the changes, there are a range of strategies in place to ensure there is minimal impact on participant's ability to access supports and services.

There are no regulatory oncosts for the community. The proposed changes will only have a direct regulatory burden and cost impact on platform providers and NDIS providers offering SIL supports and services, platform providers and providers and workers providing supports through digital platform.

### ***Regulatory impacts on SIL providers***

The estimated annual average regulatory burden for the 3,562 impacted providers is \$2.59 million, which equates to an annual average of \$794.56 per provider. This cost relates to the process of becoming a registered NDIS provider and maintaining registration through regulatory obligations. The total regulatory burden estimate of \$25.92 million is split and will vary across providers ranging in sizes. Noting a provider may provide supports for more than one service type.

### ***Regulatory impacts on platform providers***

The estimated annual average regulatory burden for the 20 impacted platform providers is \$131,626.48. This cost relates to the process of becoming a registered NDIS provider and maintaining registration through regulatory operations. The total regulatory burden of \$1.32 million is split across platform providers of a range of sizes, existing platform provider registration status and providers and workers engaging on the platform.

*Table 8: Summary of annual average regulatory burden for SIL and Platform Providers (Option 2: Implementing all mandatory registration and new registration conditions under an existing framework)*

	Participant cost (individual)	Provider cost (business) (\$ million)	Community cost (broader community)
<b>Supported Independent Living (SIL)</b> <i>3,562 providers impacted</i>	\$0	\$2.59	\$0
<b>Platform Providers</b> <i>20 providers impacted</i>	\$0	\$131,629	\$0
<b>Total</b> <i>3,582 providers impacted</i>	\$0	\$2.72	\$0

*Table 9: Summary of total regulatory burden for SIL and Platform Providers (Option 2: Implementing all mandatory registration and new registration conditions under an existing framework)*

	Participant cost (individual)	Provider cost (business) (\$ million)	Community cost (broader community)
<b>Supported Independent Living (SIL)</b> <i>3,562 providers impacted</i>	\$0	\$25.92	\$0
<b>Platform Providers</b> <i>20 providers impacted</i>	\$0	\$1.32	\$0
<b>Total</b> <i>3,582 providers impacted</i>	\$0	\$27.23	\$0

## Multicriteria Analysis and Regulatory Burden Estimate Summary

Registration is a preventative safeguard designed to increase oversight of the market and ensure providers establish good practices and have the correct competencies to deliver services and supports. Improving the level of registration in the market is an important regulatory lever that is used by the NDIS Commission to hold providers to account and ensure conformity to minimum benchmarks of service quality and safety.

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As per the MCA discussed earlier, option 2 has a positive net impact benefiting participants, carers, supporters and families, despite some cost to providers. Option 2 establishes consistent standards for all platform providers and providers delivering SIL and introduces conditions on registrations that will further improve service quality and provider capability.

The estimated regulatory burden cost to implement all proposed regulatory measures under option 2 is estimated to be \$20.68 million. It is important to note that the estimated costs captured above apply for the current market and impacted providers transitioning to the new requirements and conditions of registration.

While option 1 and 3 present no additional regulatory costs, it does not address the recommendations from multiple reviews and inquiries discussed in this analysis. Several major reviews have highlighted critical gaps in participant quality and safeguarding, with stakeholders calling for an approach that strengthens and improves quality and safety of services in the disability sector.

Although option 2 will come with additional regulatory burden on NDIS businesses, the benefits significantly outweigh the costs. The impact of proposed changes under option 2 will affect providers in different ways, depending on the size of their organisation, their current registration status and other factors. As market stewards, the NDIS Commission will continue to monitor the market, engage with participants, providers and other stakeholders, and develop plans to implement the necessary changes required, with as minimal disruption as possible. However, the non-cost benefits of introducing these reforms, such as increased benchmarks for safeguarding, significantly outweigh the costs identified.

## 5. Who did you consult and how did you incorporate their feedback?

### Mandatory registration consultation

Public consultation on mandatory registration commenced on 28 November 2024 and closed on 7 March 2025. The NDIS Commission released consultation papers outlining proposed mandatory registration requirements for platform providers and providers of SIL, seeking feedback from stakeholders via survey or written submission. The purpose of the consultation process was to determine how best to implement mandatory registration for platform providers and providers of SIL, rather than whether to proceed with mandatory registration.

Consultation Papers and “What we heard” reports on the consultations are available on the [Mandatory Registration](#) page of the [NDIS Commission Reform Hub](#).

### *Supported Independent Living mandatory registration consultations*

The consultation for mandatory registration of SIL builds on the significant consultation and engagement that has occurred with the disability community through the multiple reviews and inquiries discussed throughout this paper. Specifically, the Taskforce’s recommendation that “all providers of Supported Independent Living (SIL) and Home and Living supports should be seen as requiring registration as a matter of urgency”. As such, the focus of additional consultation was on understanding how the proposed changes may impact NDIS participants and their access to supports, and providers and how they manage the transition to these approaches.

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## **Survey responses - participants and their carers, guardians or family members**

Participants and their carers, guardians or family members sought a comprehensive range of supports and information delivered in accessible and meaningful formats, including:

- Access to clear, easy-to-understand guides explaining the registration process and its impact on participants, including case examples
- Understanding the timeline of the registration process and key dates for implementation
- Access to a dedicated helpline to answer questions about the registration process and its implications
- An uplift in provider communication that will provide regular updates about their registration status and any potential changes to services
- Ensuring they are informed about how to provide feedback or raise concerns during the transition period.

## **Survey responses - providers**

Feedback on the proposed transition arrangements indicated that only 59% of providers agreed the proposed arrangement would assist their transition, while 22% disagreed and 17% were unsure. With regards to the transition timeframes (3-month application period and 12-month audit completion), 66% considered them achievable, while 14% disagreed and 20% were unsure.

Providers identified several issues that impact on their ability to transition to new requirements such as:

- Limited resources (e.g., staff, time, finances) to complete the registration process
- Complexity of the registration requirements
- Concerns about the cost of compliance with new regulations.

Providers strongly agreed with the provision of all NDIS Commission proposed supports and information described in the survey that would assist their transition to mandatory registration including:

- Clear guidance on registration requirements and compliance
- Training and workshops on meeting NDIS Practice Standards
- Access to templates and tools for policy development
- Dedicated support channels for questions and clarifications
- Networking opportunities with other providers going through registration
- Regular updates on the registration process and timeline.

## **Written submissions**

From the written submissions, there was a total of 20 unique submissions received from:

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- disability sector and community organisations (7)
  - providers (8) and provider peaks (2)
  - participants (1)
  - other (auditor and workforce representative organisation) (2).

Written submissions were generally supportive of mandatory registration of SIL. Additional insights captured from written submissions included the following:

- Importance of ensuring continuity of supports while the registration process is underway for participants who access services from unregistered providers.
- Strong support for expedited timeframes for implementation, including broad support for proposed timeframes (up to 12 months to complete audit)
- Transition to registration must be informed by meaningful and purposeful conversation with participants and providers, and consider impacts on workers
- NDIS Commission wrap around, accessible supports and guidance is required to help prepare and deliver this process
- Registration alone does not assure quality and safety. The changes in registration requirements must be supported by enhanced and culturally sensitive practice standards and strong monitoring and enforcement
- Registration process requires overhaul in general

The implementation plan for the changes will be developed taking into consideration this valuable stakeholder feedback and will include market readiness activities and ongoing consultation. Further information regarding the implementation strategy is outlined in question 6.

To further explore the issues identified in public consultation, targeted consultation was conducted via interviews with subject matter experts and a participant focus group. Because SIL is core to housing and daily life, participants and providers agreed reforms relating to SIL settings must be managed carefully to avoid destabilising supports. Some disruption is expected if SIL providers choose not to register, but transition design can minimise harm including proactive planning and support to transition to new arrangements successfully. Smaller and specialist providers also require targeted assistance to meet new requirements.

### ***Platform providers mandatory registration consultations***

The NDIS Commission received a total of 68 submissions (26 submissions in response to our platform provider [consultation paper](#) published in November 2024, 42 submissions relating to changes to registration more broadly, some as part of a targeted campaign) and 299 survey responses from stakeholders including 60 NDIS participants/carers, guardians and family members, 137 workers and 72 providers/others.

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.

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## **Survey responses - participants and their carers, guardians or family members**

We heard in the OMI Inquiry that platform providers play an important role in supporting participant's choice, control and flexibility. During the consultation on mandatory registration, participants told us they continue to choose to use platform providers as it provides them choice over who delivers the service (85%), flexibility (67%) and control over the cost (59%).

During the mandatory registration 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 the survey reported having a negative experience with a platform in the last 12 months. 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.

When considering a support delivered through a platform provider, most participants said it was somewhat or very important that the worker holds a NDIS Workers screening (87%), has experience with people with disability (95%) and has the right attitudes and values (97%).

## **Survey responses – workers**

Workers chose to connect to participants via platform providers for safety (43%), flexibility (43%), choice (38%) and having the Platform Provider handle payment (35%).

There are a variety of relationships between workers and platforms, with 50% of workers on platforms identified as being a sole trader or business owner accessing a platform, 27.5% identified as a NDIS provider accessing a platform, 15% as an employee for the platform and 5% see themselves as contractor engaged by a platform.

Workers also expect platform providers to be accountable for supporting quality and safety with 70% of workers surveyed saying that platform providers are responsible for the quality of services delivered. 61% of workers agree with our approach to defining platform providers.

## **Written submissions**

From the written submissions, there was a total of 26 unique submissions received from:

- NDIS Participants/ their carers and guardians (3)
- disability sector peaks and community organisations (12)
- Platform providers (7) and provider (1)
- Support worker (1)
- Government agency/ org (1) and
- other (workforce and carer representative orgs, Unions) (1)

Insights captured from written submissions included the following:

- Platform providers should be defined by their shared characteristics.

- Submissions broadly supported the characteristics outlined to define platform providers and wanted an approach that ensures platforms cannot easily avoid registration by changing features or models, suggesting a clear definition and designation of powers (with oversight).
- Submissions highlighted the many functions of platform providers. From 14 submissions, 25% outlined Platforms as a service provider, 50% as intermediaries and 25% as both.
- Regulation needs to support quality, safety, choice and innovation.
- Platform providers have a key role in the quality and safety of services and supports delivered through their platform
- Registration and obligations need to be informed by the function of the platform. Submission highlighted the need to ensure obligations are clear and concise
- Clear communication and timelines from the NDIS Commission are required to ensure a smooth transition to mandatory registration.

### *Platform Provider Industry Consultative Forum*

The insights from the survey and submissions as well as insights from the Platform Provider OMI informed the conversation with Industry Consultation forums on:

- Platform provider definition
- Obligations of platform providers
- Implementation of mandatory registration

### **Key themes**

- Attendees generally supported the characteristics that was identified as important to defining platform providers. Describing the function of a platform, linkage to market and description of the platform were identified as the most important characteristics. There was broad support for the definition to capture anyone who facilitates connection and charges a fee.
- The need for platforms to balance innovation with safeguards to maintain service quality and participant trust. Attendees suggested that core obligations should include worker screening, incident management, complaints handling, and adherence to the NDIS Code of Conduct.
- The importance of platforms having flexibility to meet standards proportionate to their size and risk profile.
- Support for quality safeguards being built into platform registration, rather than requiring registration for every class of support delivered.
- Transition timeframes were generally considered reasonable with a need to ensure time for Aged Care reforms to be implemented first.

### *Targeted Platform Provider consultations*

The registration design (as outlined in option 2) was tested with Participants in three targeted focus groups. The majority of respondents supported the registration model as it would preserve service

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diversity and protect choice and control. Participants felt the design was proportionate and adaptable and embedded safeguards where risks are higher. There were mixed views on how mainstream platforms (such as those providing rideshare, meal delivery, maintenance services, and short-term accommodation services) should be considered. Registration was seen by some as impractical for mainstream platforms, however there was recognition that any platform dealing with NDIS funding should be covered and overseen in some way.

## Previous consultation

The consultations described above on the proposed measures build on previous consultation activities undertaken by the NDIS Commission and numerous inquiries. These activities have shaped the Consultation Papers, recommended options and raised issues regarding policy design and implementation that will be actively considered in the way the proposed changes are implemented. Key reviews and inquiries include:

- The NDIS Commission Own Motion Inquiries into supported accommodation
- The NDIS Commission carried out an Own Motion Inquiry into how platform providers operate in the NDIS market.
- The Disability Royal Commission (2019-23) final report and three issues papers relating to issues regarding safeguarding and the safety of services in group homes, receiving around 100 submissions in response from disability representative organisations, NDIS providers and others.
- The NDIS Review (2022-23) final report and two papers relating to quality and participant safeguarding, which considered changes to safeguarding and regulatory requirements. In total, the Review received over 3,900 submissions from individuals and organisations over the course of the Review.
- The NDIS Provider and Worker Registration Taskforce (2024) consulted on the design and implementation of a graduated risk-proportionate regulatory model and a provider risk framework. They received over 700 submissions from people with disability, their families and advocates, NDIS providers and other stakeholders.

## 6. What is the best option from those considered and how will it be implemented?

### Option selection

Three main options were considered:

- Option 1 - Maintain the current voluntary registration process for SIL and platform providers (status quo)
- Option 2 - Implement mandatory registration and registration conditions under existing framework (preferred option)
- Option 3 - Await design and implementation of future reform

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Considering the benefits related to the proposal (outlined in question 4), the preferred policy option is option 2 - to implement mandatory registration requirements for all SIL and platform providers. Appropriate conditions on registration for SIL and platform providers would also be applied.

The changes proposed in option 2 are designed to address serious quality, safeguarding and integrity issues by supporting greater visibility and oversight of the NDIS market and an uplift in the quality and capability of NDIS supports. For NDIS participants, they will benefit from improved quality and strengthened safeguarding supports delivered in a timely manner to address documented systemic failures.

## Implementation

Implementation of the reforms will require legislative amendments to the NDIS Provider Registration Rules. Transitional arrangements and requirements will be included in the NDIS Provider Registration Rules to provide legal certainty to providers. These transitional arrangements will reflect a staged approach to transition of currently registered SIL and platform providers and consider feedback on implementation considerations raised during consultation.

The NDIS Commission will undertake market readiness activities, working closely with key stakeholders such as the NDIA and Department of Health, Disability and Ageing (DHDA) to ensure the sector is provided with a sufficient lead time for the commencement of the reforms. Beyond commencement of the legislative amendments, the NDIS Commission will continue to undertake a range of activities to support implementation including the development of educational materials and delivery of information sessions on the changes and new requirements, as suggested by stakeholders in consultation.

### *Implementation plan*

A comprehensive market strategy and implementation plan has been developed to prepare and support the sector for the reforms. In summary, the implementation plan includes:

- Establishing a staged transitional registration pathway for currently unregistered SIL providers and all platform providers. This will include providing implementation support to providers and participants during transition to ensure minimal market disruption and service continuity for participants.
- Establishing a communication and engagement strategy for participants and providers to ensure the NDIS Commission is communicating clearly and regularly about regulatory reform. This will include communication of timeframes on when new obligations would apply through the [Regulatory Reform Roadmap](#), contact centre and feedback pathways and FAQs and other resources published on the [NDIS Commission Reform Hub](#) and through various other channels.
- Development of market readiness resources to ensure key stakeholders have transparent, clear and timely guidance documents and other supporting materials to meet new registration obligations.
- Regular cross-Government engagement to harmonise approaches and identify issues. The NDIS Commission has been working closely with the NDIA, DHDA state and territory governments and other key stakeholders to align plans and processes to support providers and participants to prepare for the changes. The NDIS Commission will work with the NDIA to determine whether

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access to SIL supports have been disrupted, if contingency plans have been implemented to manage risk, and what strategies are in place to ensure no loss of essential supports.

- Ongoing consultation to enable design input and testing of proposed systems changes with stakeholders to ensure the changes and their delivery are user centred.
- Continuous market monitoring to assess the impact of regulatory reform, enable early identification of potential adverse impacts and the development of timely response strategies. This will include assessment of audit impacts and liaison with key industry bodies to work through any issues identified.
- Internal capability uplift through training and education, development and modification of key policies and resources, sequencing of systems changes and operational adjustments.

## **7. How will you evaluate your chosen option against the success metrics?**

Success metrics for the mandatory registration of SIL and platform providers are outlined in question 2. An Evaluation Program Logic framework has been developed for these reforms. This framework outlines key evaluation considerations to assess the outcomes of these reforms across multiple domains to guide data collection, stakeholder engagement, and analysis.

The reforms aim to ensure unregistered SIL and platform providers engage in the new mandatory registration process. Evaluation questions assess the extent to which eligible providers have initiated or completed the registration process and any barriers to readiness. In parallel, the audit and certification are under review. Evaluation focus in this area includes whether providers are aware of updated requirements, have scheduled audits aligned with the core module Practice Standards, and supplementary SIL Practice Standards, and received sufficient implementation support to meet their obligations. These questions will help determine if foundational registration compliance steps are being achieved across provider cohorts.

The reforms seek to strengthen the NDIS Commission's regulatory intelligence capabilities. Consideration will be given to whether visibility over SIL and Platform Provider activity has improved following registration and whether new audit data for providers is supporting more informed regulatory decisions. In addition, the framework evaluates the extent to which emerging compliance and risk trends are being identified and addressed more effectively. These insights are essential for ensuring that regulatory processes remain proactive and responsive.

To improve the quality and safety of supports and services, the evaluation will investigate whether newly registered SIL and platform providers are meeting competency and quality standards. It considers whether audit and registration processes are effectively determining whether providers are meeting safeguarding expectations and if regulatory engagement is contributing to improved provider capability. Service quality will be examined through the lens of participants' experiences-particularly the delivery of person-centred services and provider adherence to the NDIS Practice Standards.

An important long-term outcome is the reduction of harm and improved safety for participants engaging with higher-risk supports such as SIL supports. The evaluation will utilise complaint and incident data to measure this and will include consultation on whether participants feel safer with newly registered SIL and platform providers. Additionally, consideration will be given as to how audit alignment with the core module Practice Standards and supplementary SIL Practice Standards have

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contributed to stronger oversight of SIL and platform providers, particularly in relation to managing service quality and risk.

The transition to registration of all SIL and platform providers aims to improve financial and operational governance. Evaluation questions assess whether providers are demonstrating stronger risk controls and whether provider registration generally is fostering greater transparency for participants and families. The evaluation also considers whether these reforms have enhanced public trust in the NDIS regulatory framework and improved provider accountability through strengthened oversight mechanisms.

Evaluation undertaken by the NDIS Commission of these metrics will use both quantitative data from NDIA payment systems, NDIS Commission quarterly performance data and qualitative feedback from participants, providers and other impacted stakeholders, including disability advocacy organisations, co-regulators and NDIS Commission staff. Data measures, including baseline, will be established and outlined for all outcomes and success metrics.

Formal post-implementation evaluation will be conducted at the 1 year, three-year and five-year time-points, with ongoing monitoring throughout the transition period to identify and address any emerging issues.

The evaluation provides a comprehensive structure for monitoring the impact of mandatory registration of SIL and platform providers. By addressing key questions across domains, the evaluation supports ongoing learning and evidence-based decision-making for continued reform of the NDIS.