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NDIS Provider and Worker Registration Taskforce

Department of Social Services

Australian Government

1 May 2024

Dear Chair

Family Advocacy welcomes the opportunity to provide a submission to the NDIS Provider and Worker Registration Taskforce. We are a not for profit disability advocacy organisation that works across New South Wales (NSW) to advance and protect the rights and interests of people with developmental disability. We have been providing individual and systemic advocacy for over 30 years.

We appreciate the significant challenge around the need to strike the right balance in minimising fraud and maximising safety alongside being afforded choice and control and the dignity of risk.

Family Advocacy endorses the submission made by the Self Manager Hub in its entirety.

By way of summary, we particularly wish to highlight [NDIS Review Final Report Recommendation 17](https://www.ndisreview.gov.au/sites/default/files/resource/download/working-together-ndis-review-final-report.pdf) raises the following concerns:

Adverse consequences such as:

* workforce shortages
* thin markets will become even more thin, especially in rural/remote areas
* stifling individualised, innovative and cost-effective solutions
* rigid service protocols, erosion of dignity of risk
* funnels people with disability into segregated, congregated "disability service land" as individuals lose access to the open market
* cost of support will increase as a result of reduced competition in the workforce.
* Registration creates a bureaucratic barrier that limits choice, control and social inclusion for a person with disability.
* Registration is no guarantee for safety - People keep people safe. A network of informal supports, increasing capability to make decisions and raise concerns and being part of community are key preventative factors to address violence, abuse neglect and exploitation of people with disabilities.
* Use of registered providers is an intrusive overreach to achieve visibility of NDIS funding. There are alternatives to achieve this such as at the point where claims are made through the new PACE operating system.

**Recommendations**

We support all of the 22 recommendations put forth in the Self Managers Hub submission. The top line being:

* Low risk and ad hoc supports available to be claimed without registration or enrolment.
* Free provider registration and accreditation for small providers and [Service for One](https://www.inclusionaustralia.org.au/project/a-service-for-one/).
* Promote self-management. Improving access to capacity building to ensure that people with disability and nominees understand the responsibilities of self-management and directly engaging support people. This might include Accountant and Human Resources advice, assistance with bookkeeping and record keeping, peer support/ peer mentoring, circle of support or Microboard, self-management mentors.
* Investment in all participants and families to build capacity to understand our rights, recognise good quality and safe support.
* Increased access to individual advocacy, especially in regional and remote Australia where there is currently extremely limited access.

Innovation that comes from self-management and the use of community-based supports, both formal and informal and any increased regulations needs to safeguard this approach as these practices often showcase excellent examples of genuine participation in the community of people with disability. There is a risk, if not thought through well, that these approaches as well as the approaches emerging will be lost.

Working together with the disability community, we can co-design and co-produce a pathway for the future of the NDIS that protects the fundamental human right to decide who supports a person with disability, while improving the safety of people with disability and the sustainability of the scheme.

Yours Sincerely

Cecile Sullivan Elder Leanne Varga

Executive Officer Systemic Advocate and Campaigns Manager

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