

Submission: Own Motion Inquiry into Platform Providers Operating in the NDIS Market

QDN

QUEENSLANDERS WITH DISABILITY NETWORK
NOTHING ABOUT US WITHOUT US

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About Queenslanders with Disability Network (QDN)

Queenslanders with Disability Network (QDN) is an organisation of, for, and with people with disability. The organisation's motto is "nothing about us without us." QDN operates a state-wide network of over 2,000 members and supporters who provide information, feedback, and views from a consumer perspective to inform systemic disability policy and disability advocacy.

QDN value statement

QDN believes that:

- All people with disability have a right to a place in the community and have contributions to make to community. This is as empowered, free citizens who are as valued, present, participating and welcomed as members of any dynamic and diverse society.
- The place of people with disability in the community is not just about people with disability having a house in the community. Core to this is that they are welcomed in the community as ordinary citizens where they are genuinely given opportunities to contribute and actively participate. People with disability need to be in communities where their individuality, their talents, and their lived experiences of disability are recognised and acknowledged.
- Culturally and historically, people with disability are not afforded the same value, opportunities or access to community life.
- Any inclusion in community for people with disability is conditional and vulnerable to withdrawal.
- Many people with disability in Queensland are excluded from the most basic experiences of ordinary lives.
- Current exclusionary practices are unacceptable and must be challenged.
- These issues affect not only people with disability but the whole community.
- The responsibility is shared. It lies within government (federal, state, and local) and the community at large, to ensure that people with disability have a place and are resourced to belong in community.

Introduction

For over 120 000 Queenslanders with disability, the NDIS has delivered critical access to services and support, many of them for the very first time as new participants¹. While QDN acknowledges the positive impacts the NDIS has brought for many people, there is also a need for overall improvement of the processes and structure of the NDIS for people with disability as end users of the scheme. Fundamental to this change process is the authentic consultation and meaningful engagement of people with disability, their families, providers and the broader sector, and the co-design of new or updated structures that support.

QDN welcomes the use of digital technology and platforms in NDIS service provision, as this can increase accessibility to some with disability who require online interfaces for health, safety,

¹ <https://www.ndis.gov.au/about-us/publications/quarterly-reports>

geographical or access reasons over face-to-face ones. It can also provide greater flexibility, choice and control for people with disability and their supporters. Increased digital engagement and service delivery, however, also highlights inequities in relation to access to the digital world for many people with disability and raises concerns in relation to appropriate safeguards and protection, particularly for people with complex disability. It is important that Platform Providers are inclusive of a diverse range of disabilities as well as for First Nations, Culturally and Linguistically Diverse and LGBTQIA+ people with disability.

Digital Inclusion: Access, Affordability, Ability

The Australian Digital Inclusion Index (ADII) illustrates, many people with disability do not have access to digital devices, the internet, and therefore critical services such as the NDIS². The national digital inclusion score for Australians with disability is 47.0, in comparison to the Australia-wide score of 56.5³. The index has also found that affordability and education impact significantly on access to technology. Australians with disability scored lower in the affordability rating in comparison to the National average, and experience lower levels of education than those without disability (21% left school before age 16 compared to 8.9% without disability). The statistics are even starker for completion of Grade 12 for people with disability; only 34% aged 20 or over completed, compared to 66% of those without disability).⁴

Many of the most vulnerable people with disability, particularly those with complex disability, psychosocial disability and intellectual disability do not have access to a digital device, cannot afford to be connected digitally in an ongoing way, and do not have the skills to use a device at a basic level (to send texts, email, or navigate websites). These barriers are increased for First Nations and culturally and linguistically diverse people with disability. We need more rigorous data on the needs of this group, as they are currently excluded from any online access and the choice and control offered by Platform Providers in connecting supports is out of their reach. Currently, most research into digital inclusion for people with disability has focused more on accessibility and usability of digital technologies and content⁵.

QDN runs a Digital Inclusion program ([Access, Affordability, Ability Digital Inclusion](#)) that provides digital devices such as smart phones, tablets and computers to people with disability in areas of Queensland as well as workshops codesigned with and delivered by people with disability to build participants capacity to use their device and engage in the digital world, particularly in times of emergency and disaster. This

² Thomas, J, Barraket, J, Wilson, C, Ewing, S, MacDonald, T, Tucker, J & Rennie, E, 2017, Measuring Australia's Digital Divide: The Australian Digital Inclusion Index 2017, RMIT University, Melbourne, for Telstra. DOI: www.dx.doi.org/10.4225/50/596473db69505

³ Thomas, J, Barraket, J, Wilson, C, Ewing, S, MacDonald, T, Tucker, J & Rennie, E, 2017, Measuring Australia's Digital Divide: The Australian Digital Inclusion Index 2017, RMIT University, Melbourne, for Telstra. DOI: www.dx.doi.org/10.4225/50/596473db69505

⁴ Australian Institute of Health and Welfare (2022) [People with disability in Australia](#), AIHW, Australian Government

⁵ Thomas, J, Barraket, J, Wilson, C, Ewing, S, MacDonald, T, Tucker, J & Rennie, E, 2017, Measuring Australia's Digital Divide: The Australian Digital Inclusion Index 2017, RMIT University, Melbourne, for Telstra. DOI: www.dx.doi.org/10.4225/50/596473db69505

project has provided invaluable information about this group of people. From data collected through the project delivered across four regions in Queensland, we know that over 50% of people could not send or receive emails, 30% were not confident in sending or receiving text messages, 35% were not confident in making or receiving phone calls or using a search engine to find information on the web (QDN, AAA Digital Inclusion Evaluation). Of the 850 individuals that engaged in the project over an 8-month period, 65% had an intellectual or psychosocial disability, and the majority of these were living in insecure or shared housing. These intersecting challenges indicate the complexity that many people with disability face in engaging in the digital world, including NDIS Platform Providers, and is an important factor in considering the accessibility and safety of the online marketplace.

Benefits

Choice and control

We understand that there are many benefits of being able to use Platform Providers in relation to people with disability having more choice and control. The ability to choose a support worker themselves is an important distinction through Platform Providers, rather than the provider assigning a worker without negotiating with the participant as to whether they are the right fit. The certainty of knowing who was coming to support them was important for QDN members, *'I know that when I book 'Shelly' (pseudonym), I get 'Shelly' QDN member.* There is also the potential to employ support workers that are willing to do a range of tasks such as cooking, cleaning and appointment support, or have different workers supporting through different roles. People with disability can have a choice around the gender of their support workers, which is important for them in terms of feeling safe.

For those who can access and navigate Platform Providers quite comfortably, it is much easier to change support workers if they were not satisfied or someone was no longer meeting their needs than through a traditional service provider arrangement, as they could easily control where the arrangement started and stopped, decide if they didn't want to work with that support worker anymore and if not, seek another worker from another online provider or app interface.

"If I knew that a support worker couldn't fulfill my needs, I would just be able to look for another one online." QDN Member

Flexibility

Flexibility is another benefit of Platform Providers which opens up opportunities for people with disability to find support workers who are located closer to the person with disability, who had particular skillsets and who can sometimes offer better or more suitable support work hours.

"I wanted to be able to find out if there were more people closer to where I live, and to find people who were willing, able and skilled to do what I needed them to do as well as someone who could work shorter support hours...some larger providers will have a minimum amount of hours they can offer support that might not suit the needs of everyone." QDN Member

Support Workers through Platform Providers are also more flexible to support people with disability in ways that other providers cannot, for example providers will often not allow support workers to accompany a person to hospital and doctor's appointments because it's against their policy, however,

support workers in the Platform Providers space are able to support in this way without approval from management.

“One of the benefits of Platform Providers is that admin is in the background and there is less approval needed by managers. With management out of the way, matters are between the support person and people with disability and support workers can make decisions traditionally made by management in some of the bigger providers.” QDN Member

Some members also preferred the option of being able to work with support workers who weren't linked to providers, so that they could come to agreements directly with their support worker about what their support was going to look like and what the financial arrangement would look like, without a provider involved, often for affordability reasons.

“I just told my support worker, what they're charging you, I'll pay you on-top of what we agreed, which benefited both myself and the support worker...we were able to come to our own private arrangement outside of the provider and that worked much better for me.” QDN Member

Accessibility

Online platforms can provide more accessible ways for people with disability to search for supports, particularly for people with physical disabilities who may be bedbound, have limited transport options and access to certain spaces. There is also a level of practicality in having online platforms as our world is becoming increasingly digital.

“I think these platforms should continue to exist, because the future is online, however, this shouldn't be at the expense of decreasing or eliminating face-to-face support services for people and communities who are unable to use online services and/or may need additional assistance to access technology, the internet, and online support.” QDN Member.

Recommendations for change

Safeguarding

QDN believe there needs to be additional Safeguarding policies, procedures, and practices when it comes to Platform Providers. The rise in Platform Providers has also created unintended consequences regarding the safety of people with disability. It can be difficult for many people with disability to discern genuine support workers from people who do not have the right intentions on online platforms. There are concerns on the lack of quality support workers as well as people who may be offering something completely different to support work on online platforms.

Education for people with disability when using the platform provider online and app interfaces in particular, is essential. For example, educating people with disability about what a platform provider is, what the difference is between online interfaces and face-to-face interfaces, how to keep safe on these platforms as well as the differences between registered and unregistered providers.

Anecdotal stories have emerged from members in relation to concerns that people with disability are being taken advantage of by support workers registered with Platform Providers through; items stolen from their homes, workers not fulfilling the tasks agreed upon and workers engaging in hostile, controlling and/or abusive behaviours towards the person with disability.

Workforce Capacity

There is currently a national shortage of support workers. A recent report by the Joint Standing Committee on the NDIS estimated that 83 000 extra workers would be required to fill the gaps in the system by 2024⁶. The report has also found that one in three support workers plan to leave their roles within the next 12 months⁷. The shortage of support workers is impacting people with disability, particularly those with complex needs, in having choice and control over the kind of support workers they engage with as well as the longevity of support given so many are leaving.

People have reported their experiences of support workers on Platform Providers stating what they will and won't do in relation to the hours that they will work, as well as the type of work they will and will not do, which creates a power inequity to the detriment of the person with disability. Instead of the participant having choice and control over who provides and what support is provided to meet their individual needs, the shortage of workers is resulting in the choice and power residing primarily with support workers. This is enhanced through the service provision provided through platforms, as workers are individual contractors, rather than an organisation that provides a range of support. People are therefore finding it more difficult to find skilled and willing support workers to attend to personal care needs and support which are essential. This dynamic prioritises the needs of workers over people with disability, limits the choices that people with disability have to receive quality support and can create an unsafe and unethical dynamic whereby workers use power and control over people with disability.

This has a particular impact for people with disability with high and complex needs and represents a failure in the market to safeguard our most vulnerable. Support workers on Platform Providers are also not required to undergo minimum skills and training, and some platform providers do not require their workers to have a yellow card.

"A lot of the providers we have had embellish their skillset, sometimes just so that they can get higher recognition for a complex needs skillset, as my son falls into the 'complex needs' category... they stay for a very short time, are often incompetent and then they leave...last year, we realised one of the workers was just aiming to get work on public holidays...he ended up leaving, told us something had happened in his family, but we saw him back online again in a couple of days...there is a lack of support in the complex needs space and filling shifts can be difficult for individuals and/or families with complex needs." QDN member

"One worker insisted on being paid to attend an initial interview with me at my home...so I never followed through with them...there are some people on the platforms that want to you rip you off...I spoke to about a dozen support workers before choosing any... I have my own recruitment skills, a specifications checklist and take resumes, I make sure that support workers are paid properly and that there's someone checking in on them, even if that's me." QDN Member

⁶ Joint Standing Committee on the National Disability Insurance Scheme (2022). *NDIS workforce final report*. [NDIS Workforce Final Report \(apo.org.au\)](#)

⁷ Joint Standing Committee on the National Disability Insurance Scheme (2022). *NDIS workforce final report*. [NDIS Workforce Final Report \(apo.org.au\)](#)

“Another issue with Platform Provider procedures is that sometimes people with disability have no control over whether case notes are recorded or not, as some providers will be required to record case notes regardless of whether a person with disability agrees or not.” QDN Member

Accessibility

It is important that Platform Providers are accessible to a diverse range of disabilities and consider the barriers that may exist for people with intellectual, psychosocial, neurological, sensory, and learning disabilities and ensure that the platforms provide a range of communication mechanisms to ensure they are inclusive of a range of diverse needs both in terms of disability and the intersection of cultural and language barriers creating additional barriers for First Nations and culturally and linguistically diverse people with disability.

“There is a wide assumption being made that people prefer to engage their services online, a lot of people from my communities don’t have the confidence to use technology... some don’t have computers or money to be able to own and operate computers and/or devices and feel ashamed that they can’t afford technology and aren’t hardwired with the skills to use it, which is a real barrier than can prevent First Nations, Culturally and Linguistically Diverse and ageing people from seeking out and engaging in support.” QDN member.

People with disability need support and resources to understand how best to recruit and vet potential support workers via Provider Platforms. This would contribute to people’s ability to find and recruit support workers that are appropriate to their individual needs. This includes using language and terminology that people understand easily.

“I didn’t even know what ‘Platform Providers’ referred to when it was mentioned to me, the NDIS need to get the wording right so that people understand what they are saying and referring to.” QDN member

Recommendations for improving the user experience of Platform Providers

Co-designed policies and procedures with people with a diverse range of disabilities; QDN has drawn on over 20 years’ experience working alongside people with disability to develop key principles of co-design in co-design with our members. These principles act as a guide to working with people with disability in the design, development and delivery of programs and policy that impact on people’s lives, in line with our motto “nothing about us without us”. [QDN’s Co-design Principles](#).

QDN provides the following recommendations:

- Investment in building the digital literacy of people with disability and their access to digital devices, affordable data, and capacity building so that they have the capability to access the digital world safely.
- Increased Safeguards in place, by introducing minimum standards, credentials, training completion and experience that support workers are required to meet to be on the platform.
- Market intervention to ensure that the most vulnerable cohorts have access to skilled support workers
- Support workers to complete further training from their provider and go through a process of online verification to ensure they are who they say they are.

- Clear advertising, that outlines all of the credentials a support worker has and whether they have a yellow card on online and app interfaces.
- More education in recruitment skills, safety, for people with disability.
- More accountability measures are in place, such as regular audits and monitoring protocols for Platform Providers.
- Accessible language, information, and communication in a variety of formats including Easy Read versions, audiovisuals, audio recordings for information/articles/any text documents, web and app content designed for screen readers, voice activation for web and app content, Auslan videos, 'Say Less, Show More' formats for all media files, braille for text and written documents as well as more video and visual formats.
- Cultural considerations in policies, procedures and practice, mandatory training for providers and their workers around cultural competency for diverse groups including First Nations, Culturally and Linguistically Diverse and LGBTQIA+ people with disability.
- Increasing support workers on platforms from diverse backgrounds so that people with disability who are First Nations, Culturally and Linguistically Diverse and/or LGBTQIA+ have the choice of being able to select a worker they may feel more culturally safe with.
- IT support and training for those wanting to engage in support from Platform Providers who may not have skills.

Conclusion

QDN believe that Platform Providers provide critical services to people with disability and whilst there are some obvious benefits to people with disability engaging in the platform, there also need to be some improvements made to policies, procedures and practices of Platform Providers to ensure safety, high quality support, accessibility to a diverse range of disabilities and accommodation of a diverse range of disabilities and communities such as First Nations, Culturally and Linguistically Diverse and LGBTQIA+ people with disability to ensure equity of access.

