

Senate Joint Standing Committee

Submission Addendum 1

Exploring the Proposed Self-Direction Registration Category

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Abstract:

This document provides an overview and critical exploration of the proposed Self-Direction Registration Category within the National Disability Insurance Scheme (NDIS). The new category, recommended by the NDIS Provider and Worker Registration Taskforce, aims to formally recognise and enable participants to design, organise, and direct their own supports, including employing, contracting and managing their own workers. The paper explains the distinction between self-direction and self-management, outlines proposed regulatory expectations and argues that the implementation of this category must be co-designed with people who currently self-direct. Key considerations are identified, including safeguarding without institutionalising, recognition of complex and high-intensity support needs, the need for accessible administrative processes, and the importance of peer support and capacity-building funding. The document emphasises that the Self-Direction Registration Category should be built on values, rights, and supported decision-making principles, not compliance-heavy regulation, and highlights the potential for self-direction to expand inclusive, personalised, and community-based support arrangements across the NDIS.

Introduction:

Self-direction has long existed as a powerful and life-affirming approach for people with disability to organise their supports in ways that uphold autonomy, dignity, and personal agency. However, within the National Disability Insurance Scheme (NDIS), this approach has not yet been formally recognised as a distinct and legitimate service model. The recent advice of the NDIS Provider and Worker Registration Taskforce recommends the establishment of a new Self-Direction Registration Category. This represents a significant moment of possibility: an opportunity to shape policy and regulatory frameworks that genuinely enable participants to design and govern their own supports in ways that reflect their values, identity, relationships, and preferred ways of living.

This document has been developed to support thoughtful and grounded co-design of this new registration category. It draws on the lived experience, practice wisdom, and collective learning of people who have been directing their own supports—many for years, and in some cases, decades. These individuals and families have forged support arrangements outside of conventional service models, often navigating barriers created by administrative rules, restrictive commissioning practices, and risk-averse regulation. Their experiences demonstrate that self-direction is not only possible but effective, safe, and deeply aligned with the core purpose of the NDIS: to expand choice, control, inclusion, and self-determination.

The introduction of a Self-Direction Registration Category will succeed only if the design process centres the knowledge of those already self-directing. This means valuing diversity in the ways self-direction is practiced, recognising both the complexity and creativity involved, and ensuring that safeguards enhance rather than constrain autonomy. The aim of this document is not just to summarise the Taskforce recommendations, but to articulate the key principles, conditions, and supports required to ensure that self-direction can flourish as a legitimate, accessible, and sustainable option for all participants who choose it.

I recommend that you read the full Taskforce Advice at:
NDIS Provider and Worker Registration Taskforce Advice.

<https://www.dss.gov.au/disability-and-carers-standards-and-quality-assurance-ndis-provider-and-worker-registration-taskforce/ndis-provider-and-worker-registration-taskforce-advice>

The Taskforce Advice provides a comprehensive overview about why self-direction needs to be acknowledged formally as an approach available to Participants to organise their NDIS-funded supports. In providing this advice, they also reinforce that the details about how this Registration Category should be implemented must be co-designed with NDIS Participants, particularly those with experience in using this approach.

What did the Taskforce recommend for participants with self-directed supports?

The NDIS Provider and Worker Registration Taskforce (the Taskforce) recommends:

- A new registration category for participants, their guardians, or legal representatives who self-direct their own supports, known as Service for One/Self-Directed supports. Participants who use self-directed supports will be required to register in this new category (Recommendations 3 and 6).
- Participants who are registered as having self-directed supports are not required to only use registered providers (Recommendation 1), unless they are in a Group Home or the supports fall in the Advanced Registration category, which includes behaviour support and restrictive practices (see Annexure A).
- Participants under the Service for One/Self-Directed Support Registration category will be required to have regular check-ins with the NDIS Quality and Safeguards Commission (Recommendation 8).
- Service for One/Self-Directed supports will be subject to review and auditing processes (Recommendation 6).
- The Australian Government should invest in peer support and capacity building programs to engage in the NDIS regulatory framework, including participants who self-direct their supports (Recommendation 7).

Source:

“NDIS Provider and Worker Registration Taskforce Advice
Fact Sheet: Self-directed supports”

<https://www.dss.gov.au/disability-and-carers-standards-and-quality-assurance-ndis-provider-and-worker-registration-taskforce/summary-of-advice-ndis-provider-and-worker-registration-taskforce>



Key Recommendations:

- Recommendation 6:

- There should be mechanisms put in place to support arrangements for self-directed supports. A process should be developed whereby the participant will register themselves for self-directed supports, and thereby all their support providers would then also automatically become registered and visible.
- The process of registration of self-directed supports should be co-designed with people with disability.
- Self-directed supports would sit in a new category within the registration categories but would also be subject to review and auditing consistent with arrangements for other service providers, except for the evaluation of Practice Standards which do not apply to self-directed supports. These approaches need to be co-designed with people with disability.

- Recommendation 7

The Australian Government should invest in offering peer support and capacity building programs to engage in the NDIS regulatory framework, including for participants who self-direct their supports.

Source:

NDIS Provider and Worker Registration Taskforce Advice (Page 51)

<https://www.dss.gov.au/disability-and-carers-standards-and-quality-assurance-ndis-provider-and-worker-registration-taskforce/ndis-provider-and-worker-registration-taskforce-advice>

A definition of self-direction:

- How did the Registration Taskforce define self-direction?

For the purposes of this document, the Registration Taskforce describes Self-Direction as occurring when ‘the participant selects and trains their own staff, develops their staff’s schedules, and sets their own standards for how their services will be delivered.’

Source:

NDIS Provider and Worker Registration Taskforce Advice (Page 53)

<https://www.dss.gov.au/disability-and-carers-standards-and-quality-assurance-ndis-provider-and-worker-registration-taskforce/ndis-provider-and-worker-registration-taskforce-advice>

- The difference between self-direction and self-management:

Self-management and self-directed supports are not the same. However, these are often conflated because participants who have self-managed plans have the choice and control over their funding to be able to adopt self-directed supports more readily. Self-management is the financial management of the NDIS Plan, whereas self-directed support is a way of managing



your supports, usually through direct employment. The Taskforce has made recommendations about self-directed supports.

Source:

NDIS Provider and Worker Registration Taskforce Advice (Page 58)

<https://www.dss.gov.au/disability-and-carers-standards-and-quality-assurance-ndis-provider-and-worker-registration-taskforce/ndis-provider-and-worker-registration-taskforce-advice>

- What might the Quality and Safeguards Commission and the NDIA expect from self-directors?

The Taskforce makes it clear that the expectations on self-directors should not be onerous and cumbersome. It is likely however, that self-directors will be required to:

- Demonstrate that the funds claimed have been used in line with the purpose for which they were granted.
- That the self-direction arrangement has mechanisms in place to ensure the Participant is not exposed to exploitation, abuse, neglect or violence.

- The Regulatory Reform Roadmap:

The NDIS Commission has released its Regulatory Reform Roadmap, which shows the timeline for activities planned to support the Commission's reform priorities until December 2025. This includes registration of Supported Independent Living (SIL) services, Platform Providers and Support Coordinators in addition to consultation regarding Self-Directed Supports and NDIS provider definition. (A graphic representation of this Roadmap is reproduced on the following page.)

October 2024

Regulatory Reform Roadmap



The Regulatory Reform Roadmap shows activities planned to support Government Reform priorities over the next 12 months



GOALS

- We are progressing changes to regulation to improve the quality and safety of support being delivered to NDIS participants.
- The reforms aim to respond to emerging and long-standing quality, safety and integrity issues and ensure participants receive progressively higher standards of NDIS supports and services.



APPROACH

- We will centre participant voices and prioritise participant groups most affected by the regulatory changes.
- Our language about the reform program will be accessible, clear and straight forward.
- We will provide a variety of consultation options (in person, virtual and online surveys) to ensure participation is inclusive.
- We will engage with State and Territory Governments and Regulators in all jurisdictions who have obligations relating to people with disability by hosting regulatory roundtables.

REFORM THEME	2024			2025											
	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
MANDATORY REGISTRATION - Platform Providers - SIL Services - Support Coordination	Consultation commences and online surveys open		Regulatory forums December to March												No earlier than 1 July 2025, platform providers, SIL providers and support coordinators commence transition into mandatory registration.
		Online Town Hall events													
		Discussion papers released Submissions open				Online surveys and Submissions close									
NDIS ACT, RULES AND STANDARDS 	Consultation commences on NDIS Bill No.2			Ministerial Roundtables held		Exposure Draft circulated for consultation no earlier than Autumn 2025									
				Discussion papers released		NDIS Rules reviewed									
		State/Territory consultation from November 1				Practice standards revised									
SELF-DIRECTED SUPPORTS AND NDIS PROVIDER DEFINITION 	Consultation commences														
		Discussion papers and surveys released. Submissions open.				Online surveys and Submissions close									Consultation outcomes shared and next steps announced.

Source: NDIS Commission reform hub

https://www.ndiscommission.gov.au/about-us/ndis-commission-reform-hub?trk=feed_main-feed-card_feed-article-content

- Factors that should be considered when designing the Self-Direction Registration Category
 - Overview:
 - The core of Self Direction recommendation is that either the Participant, their family member or someone with the authority to plan on behalf of the Participant family will be the entity that is registered and will therefore take responsibility for ensuring the service funded is delivered, it is aligned with the purpose for which funds were given and ensure the Participant is not exposed to Violence / Abuse / Exploitation / Neglect.
 - This is NOT a service provider registration category. It is a registration category for an individual Participant who is directing their own support or someone who is directing support on behalf of another.

- Factors that must be incorporated within the Self-direction Registration Category:
 - Agreement on the “standards” or elements that represent the self-direction approach.
 - People with behaviour support plans, including restrictive practices, should be able to register for the Self-Direction Category and be able to engage unregistered providers if they meet the Self-Direction criteria. This will require an adjustment to the current requirement that people with restrictive practices in place must only be supported by registered providers.
 - People with complex needs requiring 24/7 high-intensity support should be able to self-direct without the requirement to use registered providers if they demonstrate they can meet the self-direction registration criteria. To date, the Quality and Safeguards Commission rules governing high intensity supports have made it impossible for people who have been directing their own supports for decades prior to the Q&S ruling to use non-registered providers and to live in non-institutional settings.
 - The self-direction category should be open to all Participants irrespective of their disability or the level of support they require, if the self-direction criteria are met by them or someone directing support on their behalf.
 - The obligations of registration can’t be so complex and onerous that the volume of paperwork that precludes those unable to manage this administrative overload. Reporting under this category should not impose an obligation that requires the equivalent of full-time unpaid work to administer.
 - The implementation of the self-direction category should be accompanied by a commitment to help Participants organise their supports within this new Category and to be able to claim it from NDIS funding. For example, where a participant can’t type, has a high capacity to direct all aspects of their support but require someone they can delegate tasks to. This should also include the ability to claim funding for administration and financial tracking tasks. This means that there needs to be consideration given to funding items that go beyond face-to-face support and will require extensive discussion with current self-directors to be clear about what those additional items should be.
 - There should also be capacity building funding associated with this category that builds Participants’ skills, knowledge, confidence and abilities to direct their own supports.
 - There should be a clear understanding of the difference between self-direction and self-management, what it is and what it isn’t.
 - The principles that define self-direction should be developed with people already self-directing. These principles would inform who can be registered to self-direct and exclude those who would want to use this as an opportunity to benefit themselves and, in particular, are not acting in the best interests of the person they are acting on behalf of.



- These guidelines could represent a “code of practice” that self-directors commit to and define what self-direction means. This can then be used as the basis of an audit process. Once again, this audit process should not be onerous, but could request very easily generated evidence that the funds were used for the purpose they were granted and supports align with basic disability rights principles such as supported decision making.
- The foundation of the self-direction registration category should be values and principles, not a list of rules. The audit process should also be structured with a capacity-building focus for participants and/or nominees rather than a punitive regulatory or policing focus.
- There are already examples within the previous State disability funding programs of successful self-direction funding models. We don’t have to reinvent solutions that have already been explored. For example, the Queensland Family Support Program and the Your Life Your Choice program.
- We have to resist assuming that approaches to self-direction are limited to a few select models.
- The policy framework for self-direction should be premised on the principle that the NDIS should deliberately create opportunities for all participants to direct their own supports as an ultimate goal.
- The approach to self-direction should incorporate issues raised by the Unions with a focus on building the skills of support workers to provide quality support in line with the UNCRPD and ensuring they are reimbursed appropriately for their work.
- It is important that the framing of the self-direction registration category approach is led by people with experience in self-directing supports.
- There needs to be a focus on DHDA or NDIS-funded research into self-direction service approaches, the key elements required to support this form of service delivery and to show the benefits of the approach. This research could include:
 - ⇒ The value of using an individual NDIS budget to invest in the right people e.g. Opportunities for allied health and medical students to get grassroots experience supporting people with disability.
 - ⇒ Exploring the small business approaches and the value of self-directed supports to local small businesses.
 - ⇒ Better articulate the consequences of defining individual support for people with complex needs against shared support benchmarks, the limitations of that model, and what can be done to support people to transition from those settings.



Conclusion:

The introduction of a Self-Direction Registration Category marks a pivotal moment in the evolution of the NDIS. It represents not only a policy shift, but an opportunity to reaffirm the core purpose of the Scheme: to expand the capacity of people with disability to live self-determined lives, embedded in community, with real authority over the supports they rely upon. For self-direction to be successful, the regulatory framework must enable rather than constrain. It must recognise diversity, honour relationships, and trust the knowledge and leadership of people who are already directing their own supports. Most importantly, it must avoid reproducing the very institutional and compliance-driven patterns that many self-directors have struggled for decades to escape from and transform.

The Taskforce has already emphasised the need for co-design, peer support, capacity-building, and safeguards that protect without disempowering. These directions are promising, but their success will depend on how they are interpreted and implemented in practice. The Self-Direction Registration Category must be guided by values, principles, and rights, not by lists of restrictive rules. Participants must be supported to build the knowledge, confidence, and networks needed to govern their own supports, and the system must be structured to respond flexibly to the unique circumstances of each individual.

This document has sought to clarify the key elements that need to be included in the design of the Self-Direction Registration Category, and to amplify the insights of people already leading this work in their own lives, families, and communities. The next steps should be grounded in collective action. Through the application of co-design principles, we must have the opportunity to participate in consultations, share our experiences, and actively shape the regulatory settings that will determine whether self-direction becomes a widely supported, sustainable, and respected option within the NDIS. The future of self-direction will be written by those who show up, together, to define it and the willingness of the Quality and Safeguards Commission, the NDIS and DHDA to open up this conversation to genuine co-design



Recommendation to The Senate Joint Standing Committee

Based on the analysis outlined in this document, I recommend:

The Joint Standing Committee on the National Disability Insurance Scheme formally supports and recommends the immediate endorsement of the new Self-Direction Registration Category, and that its policy, principles, administrative structures, safeguards, and implementation processes be co-designed with people who currently self-direct their supports, including families, nominees, and allies.

Such endorsement is essential to realise the purpose of the NDIS based on choice, control, autonomy, and self-determination, and to remove existing systemic barriers that currently undermine the rights, safety, and wellbeing of people directing their own supports.

Rationale for Immediate Endorsement

- Self-direction is a long-established, effective, rights-based practice

People across Australia have been successfully self-directing their supports for many years, often decades. They have built flexible, personalised arrangements grounded in supported decision-making, community inclusion, and authentic control of their lives. Many have done so despite administrative, regulatory, and commissioning barriers, especially since the advent of complex registration and high-intensity support rules that inadvertently penalise or prevent legitimate self-directed arrangements.

Formal recognition is not a “new experiment”. It is overdue acknowledgment of an approach that already works.

- The Taskforce has already identified self-direction as necessary and feasible

The NDIS Provider and Worker Registration Taskforce recommended:

- Creating a new registration category for participants who self-direct (Recommendations 3 & 6).
- Ensuring participants in this category may continue using unregistered providers, except for specific high-risk domains (Recommendation 1).
- Requiring co-design with people with disability when developing mechanisms, auditing processes, and safeguards (Recommendation 6).
- Investing in peer support and capacity-building for self-directors (Recommendation 7).

These recommendations are directly reflected in my analysis, which stresses that co-design is not optional. It is fundamental to equity, safety, and effectiveness.



- Principles, not heavy compliance, must guide the category

The rationale document articulates a clear and thoughtful framework: The Self-Direction Registration Category must be *values-driven*, rights-based, and grounded in:

- Supported decision-making
- Autonomy and authority over one's life
- Non-institutional safeguarding practices
- Recognition of complex and high-intensity needs
- Practical and accessible administrative processes

Overly burdensome compliance obligations would exclude the very people the category is meant to support and replicate the institutionalisation the NDIS was created to end .

Why Co-Design Is Essential

Co-design is not consultation. It is shared leadership.

The expertise required to design this category already exists in the lived experiences of people self-directing today. These individuals have developed, tested, refined, and sustained their own systems, including:

- Worker recruitment, supervision, and training
- Safeguarding without institutionalisation
- Flexible scheduling
- Personalised risk management
- Crisis planning
- Employer obligations
- Peer-to-peer supports

Any system built without this expertise will fail and risk reinstating inflexible, provider-centric models that ignore the realities of self-direction.

Consequences if Immediate Endorsement and Co-Design Do Not Occur

Your analysis makes the consequences plain, significant, and urgent. Failure to act will lead to:

- Forced re-institutionalisation and erosion of community living

Without a clear, legitimate self-direction pathway, many people with high-intensity or complex needs may be pushed, administratively or by default, into:

- Registered provider-controlled models
- Congregate or group-based living



- Support ratios that do not meet individual needs
- Service structures they actively reject

This is the opposite of the NDIS's purpose and violates Article 19 of the UNCRPD.

- **Loss of autonomy, dignity, relationships, and identity**

Self-direction is not merely a funding model: it is an expression of identity, community, and self-determination. Without formal recognition:

- Participants lose the ability to choose who enters their home.
- Trusted relationships with long-term workers may be severed.
- Daily rhythms and routines built around personal preference, not provider convenience, are disrupted.
- People are repositioned as “service recipients” instead of directors of their own lives.

- **Administrative confusion, inconsistency, and risk exposure**

In the absence of clear rules and recognition:

- NDIA and NDIS Commission staff apply inconsistent interpretations of policy.
- Participants are exposed to unintentional non-compliance due to lack of guidance.
- Supports for those managing high-intensity needs become fragile, legally ambiguous, or unsustainable.

The supporting document describes how this has already occurred, especially under the high-intensity support rules where individuals who have self-directed safely for decades have been suddenly prevented from continuing these arrangements.

- **Continued inequity and exclusion**

Without a defined pathway:

- Only those with exceptional administrative capacity or financial resources can sustain self-direction.
- People with significant physical, cognitive, or communication impairments, including those who rely on nominated decision-makers, are locked out.
- Participants cannot access support for administrative tasks, employer obligations, or governance work.

The supporting document emphasises that self-direction must be accessible to all participants, not just the most resourced or articulate.



- Missed opportunities for innovation, workforce development, and community-based practice

Failure to endorse the category means Australia loses:

- A proven pathway for training future health and allied health students in disability rights-based practice.
- Opportunities for local small businesses and micro-providers to thrive.
- Evidence development about the benefits of self-direction.
- Expansion of peer-led networks and communities of practice.

There is already a rich history of successful self-direction models in earlier state systems (e.g., Your Life Your Choice in Queensland) that could inform national implementation, but only if the category goes ahead now.

Recommendation Conclusion

The Senate Joint Standing Committee is in a unique position to influence whether the NDIS remains faithful to its founding principles or continues to drift toward institutionalised, provider-centred arrangements.

The Self-Direction Registration Category presents a once-in-a-generation opportunity to unlock genuine autonomy and redesign safeguards, quality, and inclusion through a rights-based, participant-led lens.

The supporting document makes clear that:

- The need is urgent.
- The evidence is strong.
- The community is ready.
- The Taskforce recommendations are sound.
- The consequences of delay or non-endorsement are severe.

The Committee should therefore support immediate endorsement and mandate co-design with those who self-direct.

This will protect existing self-directors, enable future participants to take up this approach, and strengthen the NDIS as a whole.

