**Reasonable & Necessary podcast**

**NDIS Fraud and dodgy behaviours**

**On this episode of Reasonable and Necessary, Australia's leading podcast series on the NDIS, Dr George Taleporos is joined by Assistant Director of the Fraud Fusion Taskforce at the NDIA, the Director of Compliance and Worker Screening at the NDIS Commission and disability ally Peter Gregory**.

**George:** Hi and welcome to Reasonable and Necessary, Australia’s premier podcast series on everything you ever wanted to know about the National Disability Insurance Scheme, brought to you by the Summer Foundation. I’m your host, Dr George Taleporos and today, we’re talking about how you can protect your plan from fraud and dodgy providers. I’ll be joined by disability ally, Peter Gregory, as well as senior staff from the National Disability Insurance Agency and from the NDIS Quality and Safeguarding Commission. Check it out.

Hi, Bruce and Matt, welcome to the show.

**Bruce:** Thank you.

**Matt:** Thank you for having us.

**George:** Let’s start by hearing who you are and what you do in your role.

**Matt:** Thanks, George. My name is Matt Barr. I’m the director, compliance and NDIS worker screening at the NDIS Quality and Safeguards Commission. So, my role involves supporting compliance policy and strategy across the full range of the commission’s functions, including as they relate to fraud and other practices which may be noncompliant with obligations under the Act.

**George:** Great, welcome. Bruce?

**Bruce:** Yeah, thanks George. My name is Bruce Graydon. I’m the Acting Director of the new Fraud Fusion Taskforce and the investigations within the NDIA. So, that means we’ve got investigative capability across Australia and I currently manage that capacity.

**George:** Wow, that’s a great line-up for our viewers today. Now, before we go any further, let’s take a listen to an earlier conversation I had with Peter Gregory, just to get a feel of some of the dodgy provider behaviour that he talked to me about earlier in the week.

Hi, Peter. Welcome to the show.

**Peter:** Hey, George. How are you going?

**George:** Great to have you. Can you tell us some of the most common and concerning practices that you’ve encountered?

**Peter:** Yeah. So, when people are talking about support coordinators, for example, they’re talking about those practices where the support coordinator makes charges but they’re unable to get a clear understanding of what the support coordinator actually did. Or practices where it appears as though the support coordinator is making regular charges without any evidence that they’ve actually done any work. And as you know, the beauty about the support coordination role is that they’re there to assist you to identify suitable providers, to help you connect, to help you negotiate the service agreements and where people are reporting challenges, it’s in the area of charges being made without that work being done, without those connections being made.

**George:** And you’ve got some concerns around allied health practice needs and assessments as well, don’t you?

**Peter:** Yeah. So, one of the big areas I think for people is that they report engaging allied health practitioners to prepare a report, particularly for a plan review or to enable them to implement some more sophisticated support strategies and that the allied health practitioner will either not produce the report or produce a report that is inadequate to their needs and then say, “In order to adjust or modify that report, we’ll need additional payment.” So, a situation where people feel compelled to keep on paying out money for more and more information when at the outset, they’d already said, “I need a report for this purpose and we’re agreeing on an amount of money to do that.”

**George:** And what about in the area of SDA and SIL?

**Peter:** I think we’ve seen a real escalation in some dodgy practices around SDA. I think we’ve seen a real escalation in providers who have got no experience in specialist disability accommodation coming in, building group homes on spec and then entering into arrangements with some SIL providers, supported independent living providers, to fill the vacancies and when you’re building group homes on spec with the objective to filling vacancies, inevitably, you’re going to lead to people being placed into forced co-tenancies and we know historically, that means that when people are in forced co-tenancies, that will inevitably move towards abuse, neglect, domestic violence.

It’s just the equation. I think those sorts of practices are really questionable. The other associated practice that’s questionable is where the SDA provider is the landlord but they have another arm of the company that’s also the service provider. Or if it’s not SDA, the landlord is the service provider. So, if you enter into conflict with the service provider, you can be evicted. So, I think those practices where you don’t have a separation between landlord and provider really expose people to significant risk.

**George:** Well guys, what are your reflections on what Peter had to say? I’ll start with you, Matt.

**Matt:** Thanks, George and thank you to Peter for raising some really important issues. A couple of matters came directly to mind in the examples that Peter raised and the first one was really around the importance of participants understanding and exercising their rights as consumers, as well as NDIS participants. So, what I mean in terms of ‘as consumers’, everybody has rights under consumer guarantees under Australian consumer law, including that products are of quality and that services fit the stated purpose. It’s really important that participants are aware of and exercise those rights, just as they would in engaging or purchasing any other product or service for any other purpose.

The other part of that is rights as NDIS participants, so under the NDIS Code of Conduct and other obligations that the Commission regulates, participants have the right to engage supports and services that are delivered in a quality - in a safe manner with care and skill and for which support them in meeting their needs and goals under their NDIS plan. The examples also raise for me the importance around service agreements and ensuring that participants have service agreements in place with the providers they’d engage and service agreements that meet the needs and goals of participants. It’s important that in having discussions with prospective providers, participants are putting that forward in how those service agreements are designed and then executed.

It’s important in those agreements that they cover the supports that will be provided, what they will cost so that participants can make decisions around whether they are affordable and aligned with their NDIS plan, what you and the provider are responsible for. So, Peter raised the example of behaviour support plans. If you’re engaging a service agreement for the development of a behaviour support plan, you might look to include matters in that agreement in ensuring that that plan meets your needs and goals, it’s informed by evidence-informed practice and meets the requirements of consent requirements and authorisation requirements of the relevant states and territories and requirements of the Commission in relation to those plans.

Including - service agreements encourage you to ensure that the agreement states how long that plan goes for, how it may be ended or ceased and how you might deal with any disagreement under that service agreement. The examples also raised with me the importance of providers ensuring that participants are aware of how they manage conflicts of interest, particularly in that scenario where a single provider is delivering specialist disability accommodation and supported independent living. It’s important that providers are complying with their obligations in respect of that particular scenario and ensuring that participants do not experience any adverse consequence relating to a decision about what services they engage within a particular accommodation setting.

**George:** I want to go back to the issue that you raised. I often say to people, service agreement is the most important thing that you can have because even though they’re a hassle, they’re really helpful because you can negotiate things. I get service agreements that say, “We need to see your plan, we need you to pay everything in 24 hours.” I’m like, “Hang on a minute. No, no, no, no. I’m not doing either of those things and if you want my business, let’s work on this agreement together,” because ultimately, it’s something - it’s my plan funding. I should be able to decide the terms as well, if not more so than the provider, right?

**Bruce:** Exactly.

**George:** Do you want to say something there, Bruce?

**Bruce:** Well, you were taking the words out of my mouth a little bit there, George, because when - the investigator in me, there was a couple of things in Peter’s examples that lit a bit of a fire in me and they’re around the fact that we all have to be vigilant. So, my take away from Peter’s comments was I’d really encourage participants to be two things, really clever with their plan and really brave and what I mean by that is you almost have to have a plan about your plan when you go into this.

So, choose your provider wisely. Peter spoke about being sure that - because providers are a little bit - their business is to provide services to participants but they’re in a competitive market, right? There’s nothing wrong with that, but they will all, like a salesman, tell you why their service is best for you and there’s nothing wrong with that. But the onus I guess is on our participants to be a bit vigilant and do some background checks. George, when you were talking before, it’s obvious that you’ve got no problem having difficult conversations. If you need to, you’ll dig in, right?

Others find that difficult so I think going back to having a plan about your plan, I think it’s important for our participants to encourage them to have an honest conversation with themselves about, “Are they the type of people that need somebody else in their life to turn to as a trusted ally to go to when they need to have a difficult conversation with a provider?”

**George:** A lot of what Peter talked about was kind of what I call dodginess, so it’s like, “Well, I asked for this and I got something that doesn’t feel like it’s good value and in fact, I’m feeling a bit ripped off.” Now, we’ve got a term for that, I think we call that sharp practices, in the sense that it’s not fraud because there’s a difference between doing something to be dodgy and being fraudulent, is that right?

**Bruce:** Yeah. If I could jump in there, Matt, I think there’s an argument that sharp practice is fraud but I’ll tell you the difference. The difference is -

**George:** And debate it with me because I’m putting it out there as really an idea, I might be wrong. Is it all fraud?

**Bruce:** Well, from an investigative point of view, a fraud is committed when someone forms the intent that they’re going to do the wrong thing. If they are sloppy in their business practices, that might come under sharp practices, but if they form an intent that they are going to charge more than what they should be getting, that’s fraud. Intent is really difficult to prove because it’s a state of mind and therefore, can only be proved through a proven set of facts and we might gather those facts by talking to witnesses and taking statements and having a range of participants telling us that, “Well, we got charged for 4 hours of house and yard maintenance but we only ever got an hour,” or, “I got charged for house and yarn maintenance but I live in a unit complex, I don’t have a yard.”

So, that’s how we might gather the evidence to prove sharp practice. When it’s low level, we might treat that initially with a shot across their bow, “Cut it out because this will not be tolerated,” but as often happens, it can turn into something greater and again, this goes back, George, to what I was saying earlier, we need our participants to have those difficult conversations to stop providers, to pull them up, right? So, that’s why we have to be brave.

**George:** The problem is quite big. I read that the NDIA data for the - it’s over $50 million of incorrect payments. Is that - that’s a lot of money.

**Bruce:** It’s an awful lot of money and there’s a lot happening in that space right now and I’m sure we’ll get to that, to combat that. The other point that I’d make, George, is just to keep this in context. I reckon you could categorise the people that are in the industry, there’s 3 different categories. You’ve got honest people, honest providers, honest participants with no intent to do anything wrong and that is the vast majority of people in the industry and then right down the other end of the scale, you’ve got organised criminal entities that enter the scheme with 1 intent and that’s to rip it off.

They’re the tiny minority, the tiny minority but they do a lot of damage. And then talking about sharp practice, we’ve got this group in the middle if you like, who - most start out doing everything perfectly and then for reasons that we don’t see, they start to slide. They might be experiencing some financial difficulties with their business and they see it as a short-term solution but for whatever reason, they start charging for 4 hours when they should be charging for 2 and it gets away on them. It’s a lot of money, George, that’s for sure.

**George:** I’d like to talk about that issue of people claiming hours that weren’t provided. One of the really simple solutions in my head is we need to make sure participants sign off on invoices. It concerns me that people who are agency managed can essentially have their - well, a significant amount of their funding raided because they can’t - they don’t have to approve the payment. Isn’t that a systemic issue that could be relatively quickly addressed?

**Bruce:** Yes and yes. So, it is an issue and it’s an issue that we’re addressing through the introduction of a new program, this new PACE system is going to address just that. So, whilst it hasn’t been introduced yet, I think they’re - I’ve got a feeling that the trial is starting - it either has just started or is starting very soon.

**George:** Excellent, I’m looking forward to that. Long overdue. Recently, the government announced this taskforce that you’re the acting director of, Bruce, as I understand. Tell us a bit more about that.

**Bruce:** Well, I think there’s been a recognition from the government that we’ve got to do something and I liked what Dylan Alcott said the other day, that the people that are committing fraud against this scheme are literally taking away from a neurodiverse kid from getting care or from someone with a high level disability having a shower. It’s as simple as that.

So, those people that are committing fraud on the scheme, there are real people, real victims behind that and that doesn’t even factor in the families of those victims and we see this, we see family breakdown, we have - I can think of instances of parents in tears because they’ve thought that they had mismanaged their child’s plan and they weren’t aware that they were a victim of fraud. So, I think that’s a real - as I said, historically, I think it’s a bit dry. Everyone thinks, ‘Oh, it’s just a fraud against the taxpayer.’ No, not this. These are real people at real risk. So, the government has quite rightly committed quite a lot of money.

**George:** What happens if you’re a victim of fraud in this case? I’m thinking that - do people get their funding reinstated?

**Bruce:** Yep.

**George:** What does the agency do to support people through that? Because it would be very, very difficult if you rely on the funding and it’s no longer there.

**Bruce:** It’s horrendously difficult but the agency has got dedicated staff that are focused on the participants’ plans and wherever necessary, we reinstate the funds into those plans. So, we won’t let people go without services.

**George:** That’s really important.

**Bruce:** It’s super important, that’s why the scheme exists, right? So, in those circumstances where we’ve identified fraud, we will top those plans up to make sure people get the services that they need.

**George:** How do people realise that they suddenly find that they’re on the portal and the funding is not there, does the provider disappear from thin air? How do some of these cases end up being identified?

**Bruce:** Well, you’d be surprised, George, how often we will go knocking on a door because we’re investigating something and the participant doesn’t know that they’ve been defrauded. So, sometimes - and there’s lots of instances where participants go to organise an activity and there’s no money in their plan and again, this is all about being vigilant. This is why I’d love to see us change the mindset of the way we view our plans. The analogy I use sometimes is I’d like participants to think about their plan, let’s call it 100,000. I’d like them to think about that money being in cash, sitting at their front door, behind their closed, front door.

I can’t think of a human on the planet that would not keep a close on 100,000 in cash and yet essentially, that’s what participants sometimes - I’m speaking generally - we’re not vigilant enough, right? Now, the money is there, it’s behind a locked door but that doesn’t stop bad people from trying to get to it and I’d like our participants to start thinking about their plans like that. They’ve got to keep an eye on it. They’ve got to be vigilant. They’ve got to speak up.

**George:** Absolutely. Matt, your commission is set up to ensure quality and safety and to regulate the industry and people obviously who are receiving services that are similar to what Peter talked about, that isn’t quality, is it? That’s something very different. What do you do and what powers have you got to get things right for people?

**Matt:** As the regulator in the sector, we have a broad range of compliance and enforcement actions that are available to the commission to not only penalise, address, correct noncompliance but also influence a broader uplift in quality and safeguarding across the NDIS market. We do receive a lot of complaints around dodgy practices, sharp practice, which goes to unethical conduct, mistreatment of participants and their plans, conduct like coercion to engage particular services. As well as not acknowledging the privacy of participants and sharing the information about them with other providers, and not acknowledging their authority around how funds under their plans are spent, which is obviously of concern to the Commission and obviously to the NDIA.

So, where we do identify that practice, if a participant does make a complaint to the Commission, the Commission will talk to them around the issues to understand what those issues are. The commission will ask for consent and discuss options around resolution of their complaint which may also include, with participants’ consent, engagement with the agency around matters of misuse of participant funds and or fraud against the scheme and their plans. And we’ll also tell participants about what we did about their complaint, the action that we took and the outcome from that action.

That action may include as I mentioned, that broad range of compliance enforcement tools available to us and that goes from education in building the capability and understanding of providers in terms of their obligations across particularly the NDIS Code of Conduct. Which applies to all NDIS providers regardless of whether they’re registered or unregistered, through to issuing warning letters, requesting that corrective action be taken to address that noncompliance. We then have tools available to require correction of conduct including what are called compliance notices which attract a penalty if a provider fails to comply with that compliance notice.

We have the ability to enter into enforceable undertakings with providers and individuals to address noncompliance identified. And then we have the ability to seek penalties, so whether that’s through an infringement notice that the Commission can issue which attracts a monetary penalty of just over $13,000 for a body corporate, through to seeking civil penalties from a court which can range up over the $200,000 mark in terms of a maximum penalty. We also then have the ability to restrict or prohibit providers and individuals from engaging in specified activities or being engaged - or being involved in the provision of supports or services, full stop, to people with disability. And that’s through the making of banning orders and then decisions on the registration of providers such as suspension and revocation of their registration.

In terms of suspension and revocation, the effect of those decisions is that those providers can no longer deliver services as a registered provider. Meaning they are unable to provide supports and services to participants who are managed by the NDIA, as well as deliver certain supports and services for which registration is mandatory. And that includes specialist disability accommodation, behaviour support and any class of support that involves the use of regulated restrictive practices. So, we have quite a broad range of actions which are administrative as well as court-determined decisions which all go to addressing, mitigating risk for participants out of the conduct that we’re identifying.

**George:** Are you de-registering providers who are behaving this way?

**Matt:** So, through the registration process, there’s a number of assessments that are undertaken, 1 of which is assessment against the practice standards that apply, depending on the classes of support that a provider seeks to be registered for and in addition, a suitability assessment in terms of the provider and their key personnel which includes a range of considerations. Such as whether a key personnel has had adverse findings made against them, either within the context of the NDIS or elsewhere and those activities are really important to identifying providers of concern for which we may make a decision to refuse their registration and in the first quarter of this financial year, we’ve already refused 161 providers’ registration for a variety of reasons, including on suitability grounds.

**George:** Do you think that some of these - that’s good that you’re doing that. I’m just wondering, do you think that some of these providers are now operating as unregistered providers? Is there a way of tracking them down? Because clearly, we don’t want that, right? We want them out of the system entirely.

**Matt:** Yeah. So, in terms of unregistered providers, what I would encourage participants to do and particularly participants who are self or plan managing, that they can ask their provider and their workers that they engage to be screened and that’s in terms of NDIS worker screening. That means that those people have undergone a screening process to assess whether, based on the information available including criminal history records, whether they present an unacceptable risk to the safety and wellbeing of people with disability. So, that’s a really important safeguard.

**George:** That’s really important, yeah and also, I always think of - I think people often think of NDIS worker screening as the support worker but I know that as a member of a board of a disability provider, I had to be screened as well. So, you can ask the CEO for their worker screening, yeah?

**Matt:** Yeah, that’s right. So, participants - there’s information on our website that participants can access around how they can verify the clearance status of workers who they engage and they can access the worker screening database to undertake that verification. For agency managed participants, all registered NDIS providers must ensure that all workers in particular roles called risk assessed roles, which includes board members and those in control or ownership of entities, have an NDIS worker screening clearance. If any participants have concerns over the providers they engage in terms of their compliance with those obligations, they can make a complaint to the NDIS Commission and we’ll assess that accordingly.

**Bruce:** Because the Commission and the NDIA work closely together. As I said earlier, a lot of our matters are pretty complex and they include, a lot of them, a thing we call phoenix-ing, and that means organisations run by criminal entities who have a number of shelf companies if you like, just set up, ready to go, lying dormant. And when we or the Commission take action against the original business, they just shut the doors on it and walk away and they take all the participants, they phoenix them over into a new organisation and the offending continues. So, the Commission and the NDIA work very closely together to try to keep in front of that and that’s what I think is important about what now is the new Fraud Fusion Taskforce, the fact that we’re going to be dealing with 15 different agencies essentially with a common purpose, I think that’s really exciting.

**Matt:** And Bruce, just to pick up on those points, an example where the Commission and the agency will work collectively around this is where fraud is identified, we will look at the people involved, linkages to other NDIS providers, we will look at the business model and practices and identify where that practice may be replicated elsewhere. We will conduct proactive investigation and compliance monitoring activity to further mitigate risk, particularly around phoenix activity, reestablishment of entities, as well as identifying where participant details may be shared without their consent, authorisation for the purposes of continuing that fraud against their plans and the scheme.

The Commission can take a range of preventative actions. So, I mentioned before, banning orders, which can prohibit or restrict a person or an entity from engaging in a particular activity and we do have the ability to make banning orders in circumstances where a person hasn’t engaged in the scheme as a preventative measure to mitigate the risk of noncompliance by that individual in the NDIS market. And that is a tool that we are using in addition to our registration levers that we can also use to mitigate future risk of fraud and other sharp practices.

**George:** I think there are probably some people who are listening and watching and they’re thinking, ‘This doesn’t feel right,’ in terms of something that they’re experiencing with a provider. They want to do something about it, they’re afraid because it’s quite - I think it’s quite scary to make a complaint about a service when you depend on that service, when that service knows where you live. What would you say to those people who are listening with those concerns?

**Matt:** In terms of talking to the Commission, as I mentioned earlier around raising a complaint with the Commission, I understand it can be a really difficult step to take in making a complaint to the Commission. Your details will be confidential unless you provide that consent to the Commission to share the details of your complaint with another party. But raising that complaint with the Commission or providing that information to the NDIA’s fraud reporting contact line as well as email is really important because it may assist the Commission and the agency in identifying a course of concerning conduct for which we may address proactively out of assessment of that information.

You can also have conversations and we encourage participants to have conversations if they’re plan managed with their plan managers to get an understanding from plan managers around what they are doing to ensure that your funds are being spent the way that you want them to be spent. And that in addition to what we mentioned earlier around keeping records and being - Bruce used the word ‘vigilant’ - around your plan is really important to informing any discussion you might have with the Commission, with the agency or if you’re having a conversation with your provider, with your provider to ensure that you can evidence and document the services that you have received, what you should’ve received and those claims that you’re concerned about in terms of whether the services were provided appropriately.

**George:** How are you going to make sure that the provider doesn’t come after me? How do you protect them, Bruce?

**Bruce:** This has happened. Sadly, this has happened but George, I really want to point out this is very, very rare. But in circumstances where it does happen, we engage the local law enforcement. We’ll do whatever we need to do to make sure that a participant is safe. It goes back, George, to what I spoke about originally about being brave. We need participants to speak up and we need them but they need to do that in the knowledge that we will protect them wherever we can and by that, I mean that if they were to be harassed or in any danger whatsoever, they can report that to either us or to the local police and if it comes to us, to be honest with you, we’ll put measures in place to ensure that a participant is safe. If it’s okay, George, I want to talk about reporting things into the agency, into the NDIA because I think it’s an area that we can do better, to be honest with you.

I don’t want to comment too broadly because I know there’s a lot of work happening in this space and perhaps some of that is already being put in place but historically, people would report things to the fraud reporting hotline, at some point at a later date, our investigators would go and meet with them or go and make contact with them and they are often shocked to hear from us because once they’ve reported it, there’s just a vacuum.

That’s a bit there that we need to be better, we need to improve that, but it’s a really difficult balance, George, because from an investigative point of view, it’s really important that we don’t telegraph our punch and let a fraudulent provider know that we’re looking into their practices. Because as you can imagine, if we took receipt of a complaint and we got on the phone and said, “Thanks a lot for this. I’ve got a team of investigators that are looking into it. You can expect some action soon,”. That’s really juicy information and it’d be hard for most people to keep a lid on that, and the risk here is if the wrong people find out that we’re coming, a lot of bad things can happen. Like the destruction of evidence, so that means we don’t get what we need to convict someone, and like the threats and intimidation of witnesses or participants.

I respect there needs to be a balance of what we’re doing but if there’s any participants out there thinking, ‘I reported something and I haven’t heard anything,’ please don’t assume that nothing is happening because that’s not the case.

**George:** That’s really important. Now, I did ask Peter for some of his suggestions around what to do to essentially avoid having to deal with dodgy providers and here’s a few things that he had to say.

**Peter:** This question of entering into agreements with providers comes up a lot and I like to think about the process of evaluating the providers as something like a due diligence. So, the first thing that we would normally do is go online and have a look at their website. And you can get an impression of the sophistication of this provider by the website. For example, if they have a website that is chock-full of stock photographs and they haven’t even taken off the watermarks, you have to say to yourself, “If they can’t even get the presentation of their organisation right online, then how sophisticated are they going to be in meeting my needs?” That’s 1. The other is how do you contact this provider? If they’ve got a mobile number and that’s the only contact point, I say “Well, that looks as well like a provider who doesn’t have a significant resource base behind them. So, are they the sort of provider that has the sophistication that I need?”

On that website, are they saying who are the key people associated with this organisation? Seems to me that if a provider is unwilling to identify who the key people in the organisation are, then you have to be questioning whether they have something to hide. If you - I like to check out the address of that provider and then use Google Earth or Google Maps to try and find out where they are. Some of my personal favourites are providers who have addresses that look like a warehouse in some industrial complex somewhere or another personal favourite is the suburban house in a really ritzy neighbourhood and it’s really, really huge with no real indication that this is a bona-fide entity. So, these people may be legitimate but what I’m saying is that as you begin to unpack these superficial questions, you begin to be asking questions about the level of sophistication.

I like to do an ABN check to see what’s the history of this organisation, how many business names have preceded the 1 that they’re using now, and who are the proprietors of that business and whether those proprietors have any demonstrated experience in the disability area or 1 of my again, personal favourites is have they had associations with government funding activities where there’s been dodgy practice in the past? Like, association with childcare has been historically 1 of those areas where people have got into to make a lot of money. And have they chopped and changed around from 1 business activity to another that’s not really related to disability but it looks as though this has been opportunistic?

And also within my networks, I’ll be asking privately, “Have you come across this individual? Have you come across this business? What history can we put together about this business?” So, those sorts of things give us a bit of an indication of whether or not we’re dealing with somebody who has some history and some competence to deliver the services that they say they’re going to deliver. I think the other 1 that’s really nefarious is those providers who adopt names that imply they are either the equivalent of a government agency or some extension of the NDIA and doing that by the way in which they structure their name, the way in which they use the NDIS colours, the branding and that sort of stuff to create the illusion that they are in some way, an extension of a government activity or the agency.

If you’ve then decided that you’re then going to go ahead and interview this provider, then be very clear about what you’re going to ask them to provide. Don’t enter into long-term service agreements until you are clear that you want to go with that provider and get them to explain to you how they are going to deliver on a service that’s based around what you want, not what they want to deliver. This is really important. Many providers come and say, “This is the service we provide,” and the conversation has to shift to, “What will the provider do for you to provide the service that you want?” Then, once you’ve done all of that, make it clear that you’re happy to enter into a short-term agreement until we work out whether this is the right fit and of course, one of the really big indicators that this is not going to work is if the provider turns up to that interview with a service agreement already prepared.

**George:** So, it’s really a case of buyer beware, do your research, talk to other people who may or may not have heard of the service or the provider and I really appreciate you, Peter, coming on the show and telling people about your experiences because hopefully that will help more people to make sure that they do what has to be done to stay safe in finding a trusted and reliable NDIS provider. That’s really helpful, isn’t it, guys?

**Bruce:** Yeah.

**George:** Any additional tips from you guys?

**Matt:** Just a couple from me. Participants may choose to engage a registered NDIS provider which may provide a level of greater assurance because those providers have been assessed against the applicable standards and undergone those suitability assessments that I spoke about earlier. And registered providers are also subject to ongoing oversight through quality audit processes.

The other activity that participants may do is around, as I mentioned before, having a look at the Commission’s compliance and enforcement register and these are published on our website, which identifies compliance action the Commission has taken against individuals and providers, including some information around the nature of that conduct and that is really useful information to informing participants about whether or not to engage that provider.

**George:** Bruce?

**Bruce:** Yeah. From my point of view, participants really should make an effort to be really vigilant because we can’t be the sole eyes and ears of all things fraud. We need to adopt the ethos that we’re all in this together.

**George:** We totally are and this is why I wanted to do this podcast, because I think that as participants, we’re very conscious of the importance of keeping an eye on what’s going on and making sure that money goes where it should be. Thanks, Bruce. Thanks, Matt. I know that people can confidently come to either of your organisations. We’re going to have phone numbers and contact numbers available on the description below and I really appreciate your time and for sharing the important work that you do. Thank you so much for joining us.

**Bruce:** Thanks, George. It’s been a pleasure.

**Matt:** Thank you, George. Thank you, Bruce.

**Bruce:** Thanks, Matt.

**Matt:** Great to be part of this fantastic conversation. Thank you.

**George:** That’s all we have time for on today’s episode of Reasonable and Necessary. Thank you to our partner for this episode, the National Disability Insurance Agency. To be notified of future episodes, don’t forget to hit the subscribe button and the notification bell. Thanks for listening and until next time, stay well and reasonable.