



Market Spotlight: Theme analysis of complaints data

1. Background

The NDIS Quality and Safeguards Commission (the Commission) has a core function under section 181E of the *National Disability Insurance Scheme* to provide NDIS market oversight. To support this function, the Commission conducted a high-level analysis of complaints data to support understanding of the market landscape.

The approach taken in this market analysis is unique; it examines the allegations and themes raised in complaints through a market intelligence lens to provide insight into NDIS markets. It does not investigate whether the allegations were substantiated. Markets were segmented by service and support type, the nature of the issues alleged in complaints, and the provider's registration status.

2. Methodology

The purpose of this analysis was to identify systemic trends and inform the Commission's understanding of themes and issues raised in complaints as related to specific market segments and supports. The analysis involved:

- Detailed examination of 1,500 randomised complaint records from the NDIS Commission Operating System (COS) for the period 1 October 2023 to 31 December 2023.
- Review of allegations made in complaints, in order to identify prevalent NDIS supports and complaint themes.
- Categorising each individual complaint by the theme that best captured the nature of the allegations contained within the complaint.

It is critical to acknowledge that complaints often contain multiple issues; being classified into one category of complaint does not mean there were not also other allegations about a different issue. For example, a complaint containing allegations of neglect could also raise issues about poor quality practices or worker conduct.

3. Market context

As of 31 December 2023, 646,449 active participants were receiving support through the NDIS. These participants had access to a range of supports and services, which they obtained either by directly engaging with service providers or through intermediaries that connected them with an appropriate provider.

Of the total \$10.2 billion paid to registered and unregistered providers for services and supports delivered from October 2023 to December 2023, \$1.2 billion (12%) was self-managed by participants, \$5.7 billion (56%) was managed by a plan manager and \$3.3 billion (32%) was Agency-managed.¹

From October 2023 to December 2023, \$5.2 billion (52%) of total funding for the quarter was for core daily activities support, \$2.3 billion (23%) was for core social participation support, \$1.3 billion (13%) was for capacity building daily activities (therapeutic supports), \$520 million (5%) was for support coordination services, and \$140 million (1%) was for plan management services.²

The largest support category by spend, supporting more than half of all participants, was for core supports. These supports include core – daily activities, core – social and community participation, core – consumables and transport. Core daily activities includes funding for support at home, Supported Independent Living (SIL), Short Term Accommodation (STA), and Individualised Living Options (ILO).³

¹ December 2023 NDIS Quarterly Report to disability ministers, p.49

² NDIS Explore data, accessed 10 May 2024, retrieved from <https://dataresearch.ndis.gov.au/explore-data>

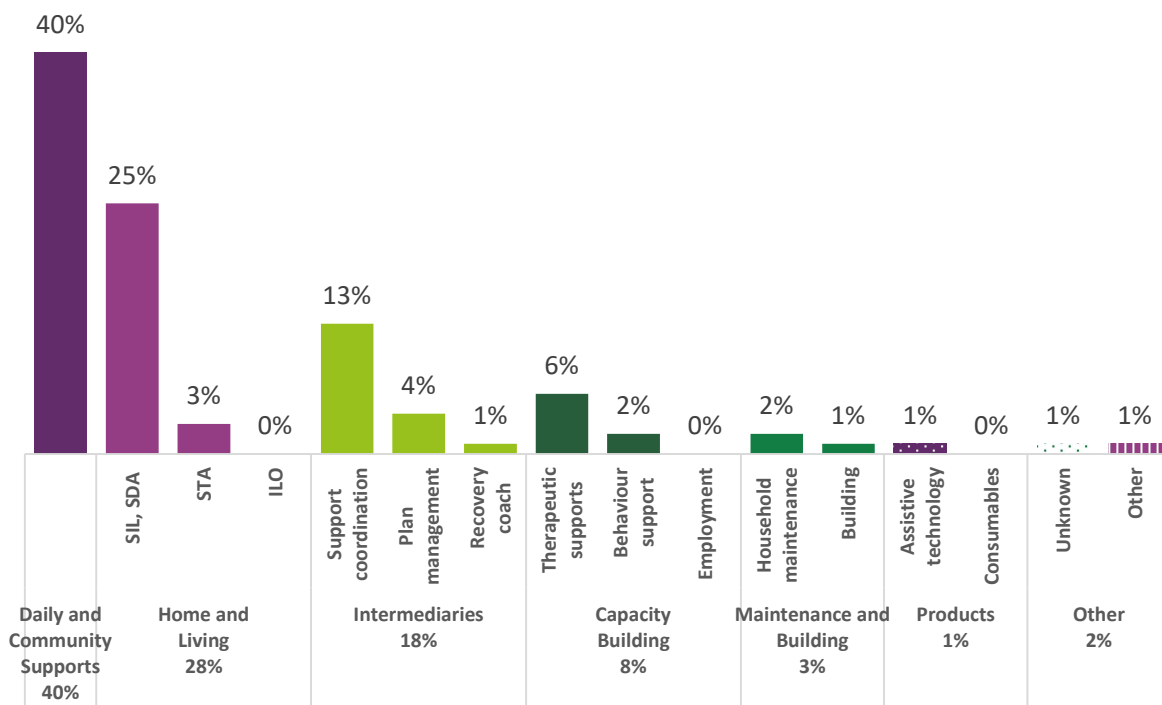
³ December 2023 NDIS Quarterly Report to disability ministers, p.48

4. Key insights

Observations by support type – overall

To better understand the nature of the complaints, each complaint was categorised by support type. Figure 1 shows the 1,500 assessed complaints distributed across the support categories:

Figure 1. Complaints by support type.



- An overwhelming 68% of complaints were about support types delivered by support workers. These support types included daily and community supports (40% of complaints) and home and living supports (28% of complaints).
- A disproportionate amount of complaints were about support coordination and plan management; these intermediaries make up only a small portion of the market (around 6%) but account for 17% of all complaints.

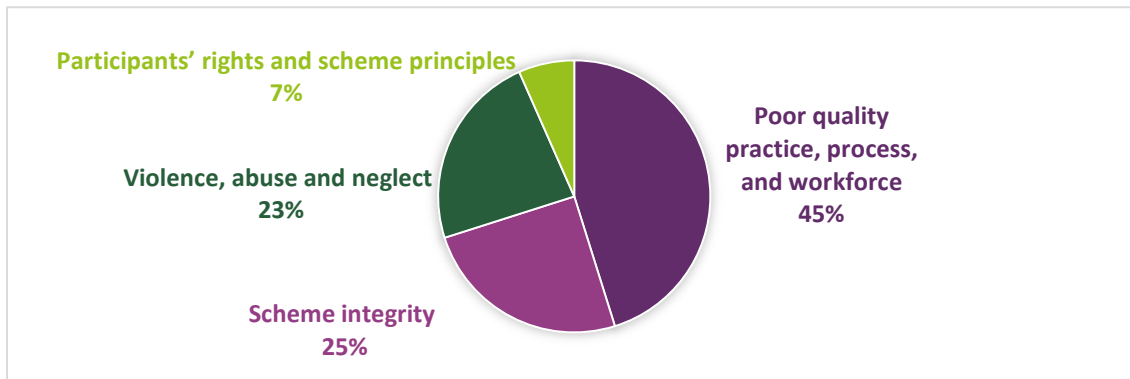
Observations by support type – specific

After categorising the complaints into support type, each complaint was examined for complaint themes.

Daily and community supports

Daily and community supports⁴ received the most complaints, accounting for 40% of all complaints received. Figure 2 shows the distribution of complaint themes within the category of daily and community supports.

Figure 2. Complaint themes for daily and community supports (%)



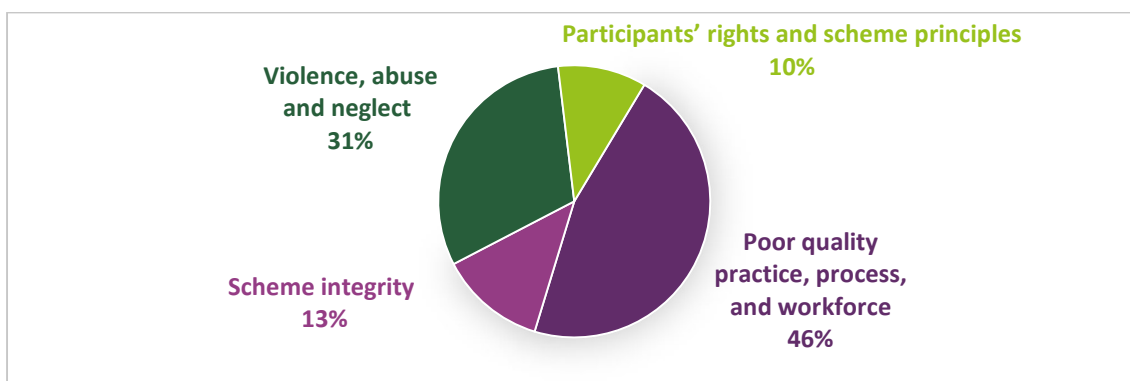
Daily and community supports made up a significant proportion of complaints related to allegations of worker misconduct, violence, abuse and exploitation.

Common themes across daily and community supports highlighted some of the difficulties of a workforce with no training requirements, including concerns around role clarity, lack of training and no market entry barrier or oversight.

Supported Independent Living (SIL) and Specialist Disability Accommodation (SDA)

SDA and SIL supports accounts for 25% of all complaints received. Figure 3 shows the distribution of complaint themes within the category of SIL and SDA.

Figure 3. Complaint themes for SIL and SDA supports (%)



Unlike other supports, SIL and SDA had issues across all themes which suggests there are multiple interrelated issues within this complex support type.

⁴ Daily and community supports include living supports, assistance with daily life, day programs, assistance with transport to appointments, assistance with social and community participation. Supports can be delivered within the home or within the community.

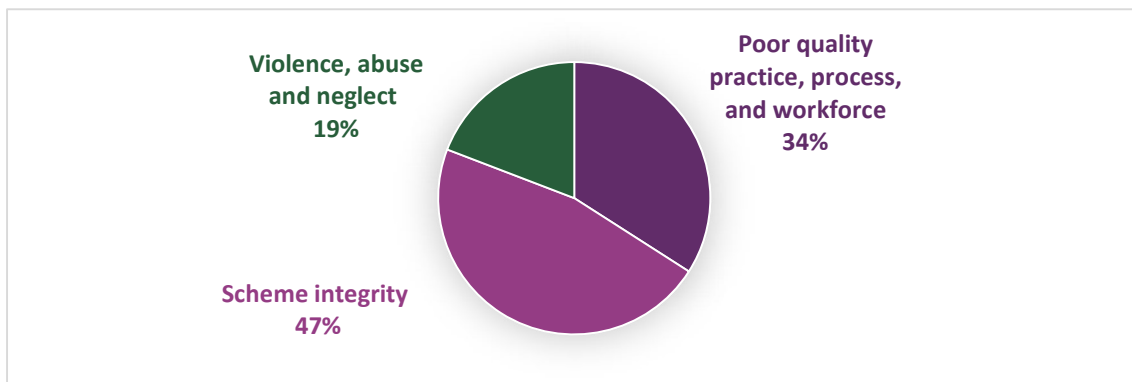
Specific issues raised about SIL and SDA included the following:

1. SIL and SDA lack the necessary leadership, process, practices, oversight, workforce and worker training required to provide effective, high quality and safe supports to participants
2. SIL and SDA had the highest prevalence of neglect across all support types
3. Conflicts between participants and their in-home support providers often led to housing instability for participants.

Short Term Accommodation (STA)

STA supports accounted for 4% of all complaints received. Figure 4 shows the distribution of complaint themes within the category of STA.

Figure 4. Complaint themes by STA supports (%)

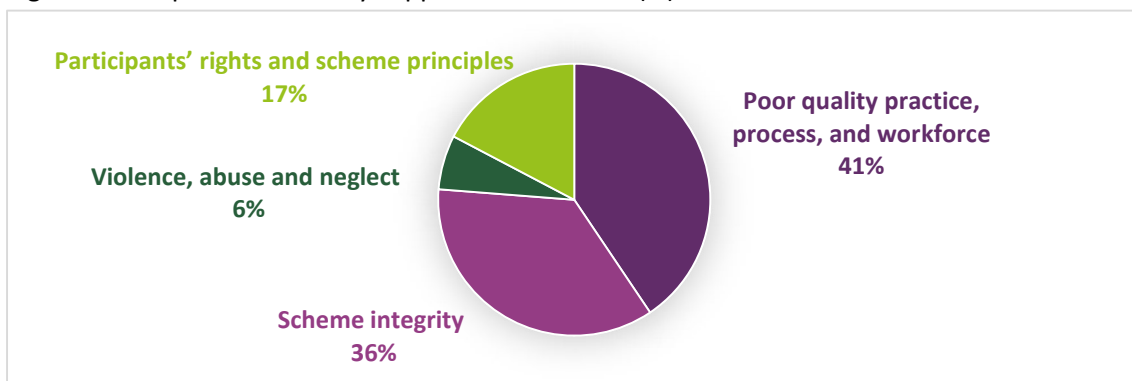


Financial integrity and exploitation were the most significant concerns raised in complaints about STA supports. These complaints revealed several ways in which STA providers were taking advantage of participants, including overcharging for services, establishing inappropriate STA arrangements, failing to properly inform participants about costs, and altering costs after supports had already been provided.

Support coordination

Support coordination accounted for 13% of all complaints received. Figure 5 shows the distribution of complaint themes within the category of support coordination.

Figure 5. Complaint themes by support coordination (%)

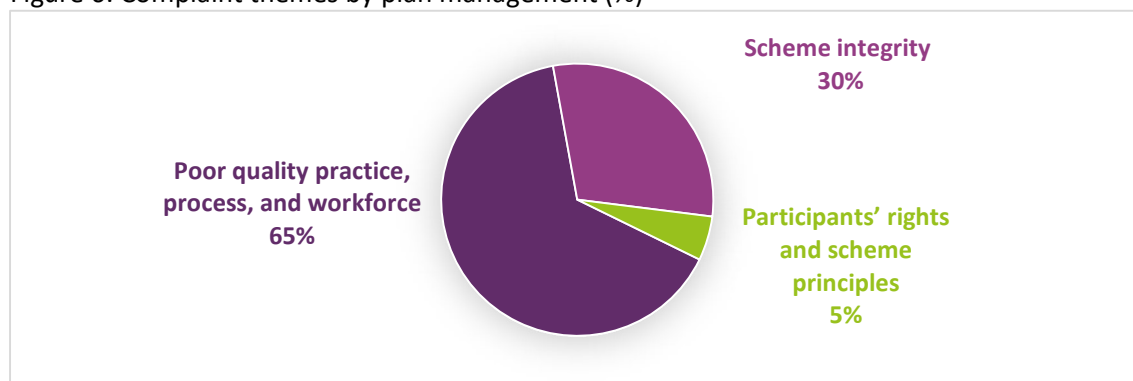


These complaints raised themes that demonstrated a lack of provider understanding about the role of support coordination and highlighted how poor quality practices impact other NDIS supports. The impact of poor quality support coordination ranged from participants not being supported to understand or use their NDIS plan, delays in accessing support, accessing inappropriate supports, or disruption to other NDIS supports.

Plan management

Plan management supports accounted for 4% of all complaints received. Figure 6 shows the distribution of complaint themes within the category of plan management.

Figure 6. Complaint themes by plan management (%)

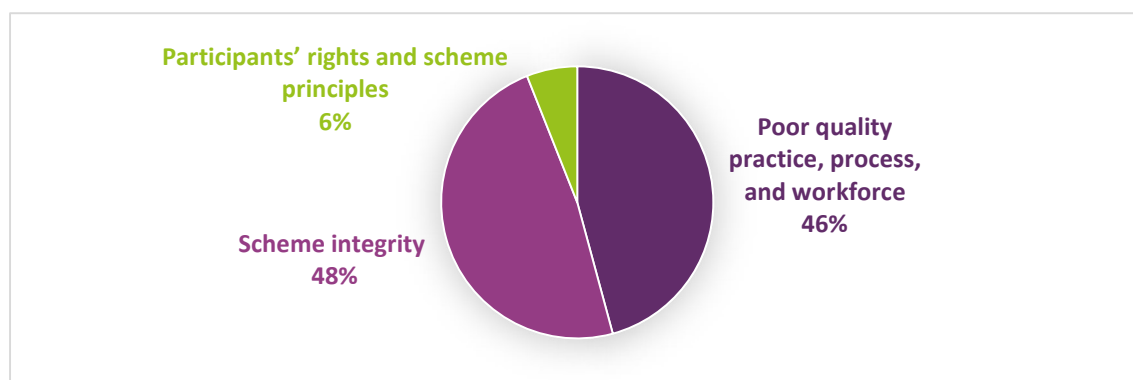


Plan management themes were concentrated in poor quality practice, process and workforce and scheme integrity, representing 95% of complaint themes. The complaints highlighted a lack of clarity and consistency in plan management expectations.

Therapeutic supports

Therapeutic supports accounted for 6% of all complaints received. Figure 7 shows the distribution of complaint themes within the category of therapeutic supports.

Figure 7. Complaint themes by therapeutic supports (%)



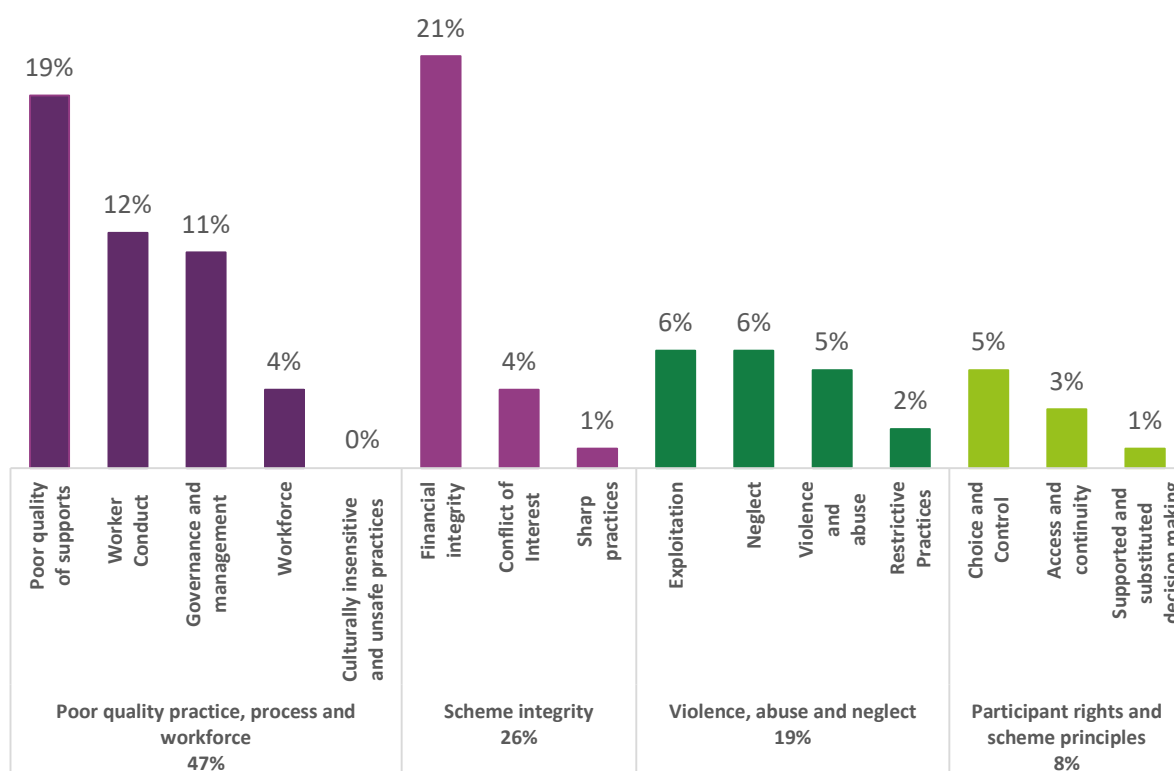
Complaints about financial integrity of therapeutic supports highlighted issues of providers charging for additional hours or imposing unfair terms on participants. Financial integrity issues often stemmed from an inappropriate application of the NDIS Price Guide by providers, as well as workforce and training deficiencies. Participants were sometimes charged more because less trained workers took longer to assess and complete required reports.

Due to the very small number of complaints received about behaviour supports, no assessment of themes for this support type was undertaken.

Observations by theme

Every individual complaint analysed was assigned a specific theme that connected to one of the four overarching themes. Figure 8 shows the 1,500 complaints distributed across the specific and overarching themes.

Figure 8. Complaints by theme



The analysis found a high proportion of complaints about poor quality, process and practice and workforce issues across all support types. The prevalence and proportion of themes varied significantly between support types. For example, daily and community supports and SIL and SDA had a higher prevalence of violence, abuse and neglect compared to capacity building and intermediaries. The different prevalence of themes across support types may be attributed to the nature of support, the type of registration, regulation model and systemic issues in the NDIS market.

5. Limitations

The findings of this analysis were limited due to gaps in the complaints data, not differentiating between alleged and substantiated complaints, and the sole reliance on complaints data rather than triangulating multiple intelligence sources. While the complaints data can provide insight into systemic themes in the NDIS market, it may not have captured all issues. It is important to note that a low number of complaints about a specific theme or support type does not necessarily mean there were no issues about that theme; it can indicate a lack of reporting through the Commission's complaints process.

6. Conclusion

The analysis conducted offers valuable insights into specific market segments, provider registration, and complaint themes. The range of themes identified highlighted the complexity, breadth and risks of challenges to both participants and providers that can occur when delivering NDIS supports. The analysis highlighted areas where complaints were more prevalent, and the issues associated with different market segments. It is important to recognise that this analysis represents a snapshot of a three-month period and may not necessarily reflect broader patterns or trends in the market.