



Submission to the NDIS General Issues Inquiry

27 November 2022

I want to share my experience of being a sole trader psychologist and meeting the NDIS commission's criteria for ongoing registration.

As a psychologist I am already required to meet all of AHPRA's rigorous registration requirements. Becoming a psychologist in the first place – and remaining one – isn't just a matter of obtaining a university degree and requisite experience. AHPRA has measures in place to ensure that all practitioners are up to scratch in all sorts of ways. This includes ongoing professional development, supervision, and a range of other requirements. I won't bore you with all of the details.

When I commenced working with NDIS clients, AHPRA registration was seen as fit for this purpose. As of three years ago, however, I was told I had to meet a new set of requirements in order to counsel my agency-managed NDIS clients as an NDIS-registered practitioner. I now have to go through an auditing process every three years. In fact, I'm in the midst of that now. The most competitive auditors I have found are charging me more than \$1000. Based on my experience of this process three years ago, the process appears to consist of about an hour's work (but much more on my part – keep reading) for someone who works for that firm. This person essentially has to check that my documents and policies are in order and then ticks some boxes accordingly

before signing off on my registration. Last time this 'auditing' process took a few emails back and forth over a very short timeframe. Yes, for about \$1000.

I gather that what this process requires me to show is that I am who I say I am, a psychologist and not a criminal, that I am insured, and that despite being a sole trader I have a number of policies in place for all sorts of contingencies, including occupational health and safety (yes, for a sole trader), and disaster planning. It could be argued, I suppose, that having these policies in place provides an opportunity for reflection and contemplation about various contingencies. Should there be an earthquake while I am counselling a client and my office starts to quiver and crumble, I will be in a position to comfort them by saying, "Wait, I have a policy on this around here somewhere, just give me a minute".

Yesterday I completed a beginner's module online about the NDIS, because the auditor informed me this is mandatory. It seemed akin to a qualified chef who, in order to maintain his employment, is required to complete an online module on chopping and frying onions and garlic. It seemed fine for someone contemplating an NDIS career, but for an experienced psychologist who has worked with NDIS clients for five years?

This whole 'auditing' or 'verification' process is a waste of my time and money, and it doubles up on work done by AHPRA, the genuine and public professional body who oversees my practice (as opposed to a private company who has won a government contract by means unknown). Nevertheless, I want to continue doing this work, so I jump through the hoops.

Meanwhile more and more of my NDIS clients are seeking plan-management, whereby practitioners do not have to be NDIS-registered. Those who remain agency managed are a shrinking minority. So, in three years it is likely that I won't need to bother with this process. In any case, I am fairly sure that the

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majority of people seeking counselling from psychologists under NDIS are now seeing practitioners who have not been through the process I have described (as NDIS registration is only necessary for psychologists seeing agency-managed participants). Presumably NDIA understands and is fine with this. This seems strange to me. Does NDIA fear for these unprotected participants' welfare? If not, why not?

It irritates me to think that someone somewhere dreamed this process up as a good way to protect participants. The auditing process may add benefits where other services are concerned, such as for organisations without other professional regulation and oversight, but for professionals/sole-traders like me it's really nothing but an annoyance. Last night I told my wife that it's like going through the process of obtaining your driver's licence, and then being told that in order to drive on the north shore of Sydney you need a separate licence for which you need to undergo an additional driving test every three years. You could even extend the analogy: motorbike riders (representing practitioners seeing plan-managed clients) can continue to ride wherever they want.

Since I went through this process last time it has been expanded. Given that I've already supplied my various identity documents to the auditors, I'm not sure how it helps protect NDIS participants to then have to submit these documents a) online to Service NSW and b) in person at Service NSW at a cost of \$80 for an NDIS worker screening check: much more reasonable than the additional \$1050 I'm paying my auditors. If it was up to me the screening check for \$80 on its own would be reasonable (on top of my psych registration process). Alas, nobody seems to be asking me for my opinions.

I have complained via phone and email to both the office of the minister responsible and to the NDIS Commission about the ridiculous nature of this

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process. The minister's representative pointed me towards the NDIS Commission, who in turn referred me to the legislators.

My problems outlined here are not the biggest ones in the world. I am aware that they do not compare to many problems faced by people with disabilities. But I am trying to help some of these people, and this unnecessary red tape is a barrier to my ability to keep doing that. You should remove this red tape, or ensure that it only serves to improve things for participants, not act as a barrier to the people trying to assist them.

People with disabilities and others who advocate for them rightly rail against the unnecessary obstacles put in front of them. I am glad the NDIS exists to help take away as many of these obstacles as possible. But meanwhile the obstacles you erect in front of others like me trying to help those people can also be seen as obstacles to the participants themselves. When I first started working with NDIS participants, I often recommended to colleagues that they look into doing likewise. I wouldn't advise them to seek NDIS registration now. Because of all of this crazy red tape and expense, I have no doubt that the pool of good people available to work with NDIS participants is already much smaller than it would be otherwise.

To conclude with a question, how does any of this really help anyone?

Yours sincerely,

Jim Filshie

Psychologist