Digital Security & Compliance Policy

Purpose and Scope
The purpose of this policy is to ensure that Boon Consulting and our clients are not exposed unnecessary risk and identify potential fraud and compliance concerns as early as possible.

Fraud Prevention Measures
Part of Boon Consulting's role as a Registered Plan Management Provider for the NDIS is to ensure that all claims made are in compliance with NDIS legislation, the NDIS Supports Lists, Operational Guidelines and the NDIS Pricing Arrangements and Price Limits, and the participant's NDIS Plan. This can only be done when sufficient information is included on every invoice submitted for claiming. The following measures are in place to address potential fraud and security risks, as well as ensure compliance and claims made in error or outside the guidelines set out in the NDIS Pricing Arrangements and Price Limits.

Cyber Security
To protect against potential cyber threats, breaches, and unauthorised access to confidential information, the following protocols are in place:

- Hyperlinks in emails and PDF documents will not be accessed under any circumstances.
- Provider invoices must be provided as either a PDF, JPEG or PNG file.
- Bank account details must be on the invoice. Links or QR codes will not be accessed.
- Access to cloud storage is restricted to Boon Consulting employees. Creating local copies of any client or provider documentation is prohibited.
- Boon Consulting will provide access to all required software and technology systems and is responsible for maintain the access requirements for all systems.

Provider Records
To protect against fraudulent or scam claims, the following protocols are in place:

- Every invoice received from a **new provider** that is not already in our system must have the following information checked prior to processing the claim:
    - The ABN listed on the invoice must be checked on the *ABN Lookup Register* to confirm it is active.
    - The entity name attached to the ABN must be listed on the invoice.
    - If a Business or Trading Name is being used, it must be one of the registered business names attached to the ABN on the *ABN Lookup Register*.
    - The accountholder name provided for bank accounts must match either the entity or one of the registered business names attached to the ABN on the *ABN Lookup Register*.
    - If the invoice is for therapy supports, the practitioner must be listed and their name searched on the appropriate registering body website.
        - Where the practitioner registration cannot be confirmed, the provider must confirm in writing that the practitioner holds the required qualifications and registrations required for the line item they are invoicing under.
- Every invoice received from an **existing provider** that is already in our system must have the following information checked against the existing provider file to confirm they are the same prior to processing the claim:

    - The ABN
    - The entity name or trading or business name
    - The bank account name, BSB and account number
        - Changes to provider bank details, without changes to the ABN or business name, require the new details to be provided in writing and then confirmed verbally during a phone call initiated by Boon Consulting staff.

- Providers wishing to update contact details must do so in writing from the email address originally provided. Boon Consulting will advise the provider by reply email when the updates have been made.

- Payments are made daily following the release of funds from the NDIA.

- Remittance advices are sent immediately after the successful processing of payments.

Participant Identification and Privacy

To ensure that each invoice is processed and claimed from the correct participant's funding, the following protocols are in place:

- Invoices must include the participant's full name and NDIS number and ideally include a third point of identification such as residential address, date of birth, or phone number.

- Invoices must be in the name of the participant, as they are the one receiving the service.
    - The plan manager can be listed as the entity receiving the invoice.

- Boon Consulting is unable to give out a participant's personal details that the provider has not already been given by the participant or their authorised representative.
    - Confirmation that Boon Consulting is the plan manager for a participant can be given, so long as the provider is able to provide the participant's full name and NDIS number.

- Budget information, approved funding amounts, and remaining budget balances will not be released to any provider without explicit written consent from the participant or their authorised representative.

- Support Coordinators can only be given portal access to a participants file, following a written or verbal request from the participant or their authorised representative.

- Participants who wish to update their bank account details are required to provide the new details in writing and confirm verbally during a phone call initiated by Boon Consulting staff. This change can only be requested by the participant, or the nominee or child representative listed in the NDIS Provider Portal.

Compliance of charged services, supports, and products

To ensure that only supports that are considered an NDIS Support for the participant that an invoice relates to, the following protocols are in place:

- At the commencement of a new plan, Boon Consulting will review the plan document, the NDIS Provider Portal, the Budget Breakdown (if provided), and the NDIS Pricing Arrangements and Price Limits (PAPL) and advise the participant in writing of any restrictions, stated items, and funding periods they need to consider when engaging supports during the plan period.

- Upon receipt of a quote or service agreement, Boon Consulting will review the plan document, the NDIS Provider Portal, and the Budget Breakdown (if provided) to confirm that the service or support is covered by the participants funding and that the services can be accommodated by the plan budgets and funding periods.

- Every invoice received will be checked that the following items are included and correct:

Invoice number	Invoice numbers must be unique to each provider as this is the primary identifier for each claim
Invoice date	The invoice date must not be prior to the date of service or be a date in the future.
Dates of service	A full list of dates, and the hours/quantity associated with each date must be included, even if the charges are consolidated on to a single line. Claims can only be processed after the date of service has passed and not pre-payments can be made outside of some Assistive Technology and Home Modifications
Line item numbers	Line items provided must be correct as per the PAPL and Pricing Schedule, including budget category, registration groups, and claim type suffix. Transport and travel costs have a corresponding direct support line item.
Line item descriptions	Where a line item number is not provided, the description should match, or closely match the appropriate line item description. Vague descriptions (like 'support work') cannot be accepted.
Price limits	Hourly rates must not exceed the price limit listed in the PAPL and Pricing Schedule. Price limits are to be considered GST inclusive rates.
Time and quantity units	Time and quantity units should not exceed 2 decimal points.
Formatting of currency and time	All amounts are to be in Australian Dollars, using the currency identifier '$'. Dollars and cents are separated by a decimal point, i.e. $12.34 All currency amounts must not exceed 2 decimal points.
Calculations	Line totals and invoice totals must calculate accurately, taking into account correct rounding where required.
GST	Any GST amounts must be clearly stated and identified in the line item and in the total calculation.
Medicare & private health insurance (PHI)	References to Medicare or PHI cannot be included. NDIS supports and Medicare/PHI services are not interchangeable.
PAPL general claiming rules	All applicable General Claiming Rules in the PAPL must be adhered to. In particular: • Provider travel limits regarding maximum time and hourly rate applicable. • Return travel charges must be clearly identified to confirm compliance, and the charge is not a duplication. • Shifts that cross time/rate boundaries must have shift times included to confirm if the full shift can be charged at the higher rate. • Split shifts must included start and end times to confirm the charges are not a duplication. • Cancellation fees must match the maximum time permitted. Service Agreements do not override the PAPL limits. • Establishments fees can only be paid following the required period of time and number of weekly hours have occurred. A service Agreement the includes the Establishment Fee must be in place prior to the commencement of services.
Reimbursements to Participants	Where a participant has paid for a service or product and requires to be reimbursed, the participant must provide either an invoice that shows a $0.00 balance, or proof of payment (I.e. a screenshot of the bank transfer or credit card payment) before the reimbursement can be processed.

Documents that relate to this policy

- Provider Invoicing Guide
- NDIS Supports Lists (including Replacements Supports)
- NDIS Pricing Arrangements and Price Limits
- NDIS Pricing Schedule
- NDIS Operational Guidelines

Review and Revision

Endorsement Date:	**Reviewed Date:**	**Reviewed Date:**	**Reviewed Date:**	**Reviewed Date:**
29/05/2026	27/07/2026			
Reviewed by:	Lindsay Hayes			
This policy and procedure will be reviewed at least annually, and changes endorsed by the Management Team.				