

31 January 2025

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Department of Premier and Cabinet, Tasmanian Government

Sent to email: disability@dpac.tas.gov.au

RE: Feedback on the draft *Tasmania's Disability Strategy 2025-27*

TasCOSS welcomes the opportunity to provide feedback on the draft *Tasmania's Disability Strategy 2025-27* 'the Draft Strategy' and identify any major gaps or issues.

The Tasmanian Council of Social Service (TasCOSS) is the peak body for the community services industry in *lutruwita*/Tasmania. Our Vision is of one *lutruwita*/Tasmania, free of poverty and inequality, where everyone has the same opportunity. Our Mission is to challenge and change the systems, behaviours and attitudes that create poverty, inequality and exclusion, to ensure all Tasmanians have equal opportunity to live a good life.

TasCOSS notes that the Draft Strategy builds upon *Accessible Island: Tasmania's Disability Framework for Action* and is designed as a short-term transitional plan, 'filling the gap' until the requirements of the *Disability Rights, Inclusion and Safeguarding Act 2024* are in place. We also note that the Draft Strategy has been informed by consultations undertaken with the disability community; *Australia's Disability Strategy 2021-31*; recommendations of the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability; and the National Disability Insurance Scheme (NDIS) Review.

We also note that the Tasmanian Government advises that the next disability strategy will have a greater emphasis on consultation and co-design with people with disability, consistent with *Australia's Disability Strategy 2021-31* and we welcome that approach.

Our feedback expands on the views and recommendations expressed by TasCOSS during previous consultations and feedback provided to the Minister for Disability Services, the Hon Jo Palmer MLC, on proposed amendments to the Disability Rights, Safeguarding and Inclusion Bill (now the Act). Our feedback also reflects the views of some of our member organisations that deliver disability services.

Overview

TasCOSS welcomes the Draft Strategy's continued commitment to a social model of disability for Tasmania, including an emphasis on changing the physical, attitudinal, communication and social environment to ensure that people with disability participate in society on an equal basis. The overall vision, principles and outcome areas of the Draft Strategy don't raise any particular concerns, although we note there is a need for greater emphasis in the strategy on it being a whole-of-government strategy rather than a compilation of separate departmental actions.

Additionally, we would like to draw the Government's attention to areas of the Draft Strategy which could be improved to ensure that it provides greater clarity on how and when its actions and overall vision will be achieved. These five areas are:

1. Timeframe for appointing a new Disability Commissioner;
2. Urgent work to deliver the system of Foundational Supports;
3. Educational opportunities for adults with disability;
4. Housing for people with disability; and
5. Timeframes and indicators.

1. Timeframe for appointing a new Disability Commissioner

The appointment of the new Disability Commissioner (Action 3.17) currently has a timeframe of 'to be determined.' TasCOSS calls on the Government to commit to a timeframe for the appointment of a Disability Commissioner and for this appointment to be made as soon as possible in 2025, in alignment with implementation of the *Disability Rights, Safeguarding and Inclusion Act 2024*. TasCOSS also proposes, in order to provide greater transparency and promote engagement by the disability community, that the Disability Commissioner could develop an initial action plan that outlines their aspirations and activities for the first 12 months of their appointment.

2. Urgent work to deliver the system of Foundational Supports

Action 4.1 of the Draft Strategy commits the Government to "commence on the commitment to design, fund and commission Foundational Supports, creating an ecosystem of disability supports to better meet the needs of people with disability in and outside the NDIS." Foundational Supports are intended to consist of (1) General Supports — which include information and guidance, peer support and capacity building; and (2) Targeted Supports — as recommended by the NDIS Review, for people not receiving support through the NDIS and needing more support than is available from mainstream services.¹

With regards to General Supports, TasCOSS notes the critical importance of adequately funding individual and systemic advocacy services in Tasmania to ensure that people with disability can effectively advocate for themselves and influence the design and delivery of policies and programs which affect them.

At present, the system of Foundational Supports in Tasmania is underdeveloped and insufficient to meet the needs of people with disability. Recent research into Foundational Supports found that in Victoria and Tasmania there are "complex, disconnected and incomplete markets of services and supports" and 90% of survey respondents said that services are currently inadequate to meet their needs.²

Evidence from a recent study of unmet needs for psychosocial support in Australia estimated that 97% of the psychosocial support hours needed in Tasmania were not being provided, which was the worst result of all states and territories.³ The Mental Health Council of Tasmania has raised concerns about the quantum of this unmet need for psychosocial supports, noting the importance of these supports for people with moderate to severe mental health

¹ Department of Social Services (2024), [Foundation Supports](#).

² Olney, S, Mills, A & Fallon, L. (2022), *The Tier 2 Tipping Point: Access to Support for Australians with Disability without Individual NDIS Funding*, June, Melbourne Disability Institute, Melbourne.

³ Health Policy Analysis (2024), *Analysis of Unmet need for Psychosocial Supports Outside of the National Disability Insurance Scheme*. August, Health Policy Analysis, Sydney.

issues to ensure they can live independently in the community and avoid more acute, complex and costly forms of intervention and care.⁴

These findings of a high level of unmet need in Tasmania are consistent with what is observed nationally. The NDIS Review found that the system of Foundational Supports across Australia is fragmented and insufficient, especially for people with disability outside the NDIS.⁵ Similarly, National Disability Services has raised concerns about the current system of Foundational Supports, noting that “eligibility for NDIS-funded individual supports often serves as the dividing line between access to necessary services and going without.”⁶

The findings of a national survey conducted in 2024 highlighted the inequity in the distribution of unmet needs for support for children and adolescents: “[...] after accounting for differences in the child’s functional difficulties and disability types, higher number of unmet needs was associated with lower family income, the presence of adults with disabilities, single parent families, and residence in regional or remote areas.”⁷

The Department of Social Services has noted that Foundational Supports are expected to be rolled out in stages, with the first stage to be delivered in 2025.⁸ Under the Disability Reform Roadmap for 2024 and 2025 agreed by the members of the Disability Reform Ministerial Council in September 2024, the Tasmanian Government has committed to the phased implementation of Foundational Supports in 2025-26.⁹

This timeframe, which includes a commitment to joint state and federal funding, should be explicitly stated in the strategy.¹⁰ The effects of reforms to the NDIS are already being felt by Tasmanians with disability and their families and carers, and the system of Foundational Supports in Tasmania must be urgently progressed in 2025 to ensure that people with disability do not fall through widening service gaps, and to ensure achievement of the first policy priority for Outcome Area 4 — “People with disability are able to access supports that meet their needs.” Action 4.1 needs to be urgently *completed* rather than merely *commenced* in 2025-27, with the first stage of Foundational Supports designed, funded and commissioned this calendar year. As such, TasCOSS recommends that Action 4.1 be rephrased, replacing ‘commence’ with ‘deliver.’

In order to deliver on this commitment, the Tasmanian Government will need to take account of and add a new action to the strategy which seeks to address, the significant workforce issues in the health and disability sectors in Tasmania, including concerns about recruitment, retention and remuneration.

⁴ Mental Health Council of Tasmania (2024), ‘Three quarters of Tasmanians missing out on the mental health support they need,’ media release, 20 August, Hobart

⁵ National Disability Insurance Scheme (2023), *Working Together to Deliver the NDIS: Independent Review of the National Disability Insurance Scheme Final Report*, Canberra.

⁶ National Disability Services (2024) *Building Stronger Foundations for Inclusive Disability Supports*, Melbourne.

⁷ O’Flaherty, M, Hill, J & Smith-Merry, J (2024) *Australian Children with Disabilities’ Unmet Support Needs*, Life Course Centre Working Paper Series, 2024-37. Institute for Social Science Research, The University of Queensland, Brisbane.

⁸ Department of Social Services (2024), [Foundational Supports](#).

⁹ Department of Social Services (2025), [Disability Reform Roadmap](#).

¹⁰ The Hon Amanda Rishworth MP & The Hon Bill Shorten MP (2024), [‘Building a strong ecosystem of disability supports’](#), media release, 30 January, Canberra.

3. Educational opportunities for adults with disability

TasCOSS notes that the Actions listed in Outcome Area 5: Education and Learning in the Draft Strategy are exclusively focussed on education for people with disability working for the Department of Police, Fire and Emergency Management, and education for children and young people with disability. The Tasmanian Government needs to ensure that education and learning is accessible for all Tasmanians with disability, including adults with intellectual or profound disability, with a particular emphasis on literacy skills, including digital literacy.

TasCOSS recommends the addition of a new Action in the Disability Strategy, including a funding commitment, to improve access to education and learning for adults with disability, reflecting Policy Priority 3 — “Improve pathways and accessibility to further education and training for people with disability.”

4. Housing for people with disability

The NDIS Review Final Report makes two recommendations about housing for people with disability: Recommendation 8 — Fund housing and living supports that are fair and consistent, and support participants to exercise genuine choice and control over their living arrangement, and Recommendation 9 — Deliver a diverse and innovative range of inclusive housing and living supports.¹¹

In light of these recommendations, and to ensure the Tasmanian Government meets its commitments to reform housing and living supports for Tasmanians with disability, there is a need to not only increase the supply of *new* social housing (as per Action 2.3) but also ensure that *existing* housing stock is better utilised by ensuring it is fit-for-purpose for people with disability. This is particularly salient given the Royal Commission’s recommendation in 2022, calling on governments to develop a roadmap to eliminate group homes for people with disability within 15 years; and the Tasmanian Housing Strategy Action Plan (2023-27), which highlights the importance of delivering more accessible homes that meet Gold Level livability standards.^{12 13}

TasCOSS recommends a new action is included in Table 1 to direct efforts towards ensuring existing social housing better meets the needs of people with disability.

5. Timeframes and indicators

There is a general need for the strategy to include specific timelines and more measurable indicators for all its actions — many of them currently have timelines of ‘to be determined’ or ‘ongoing.’ Greater clarity around timeframes and indicators in the strategy will make it easier to measure the Government’s performance and also strengthen the strategy’s transparency for stakeholders and the broader community.

In addition, Actions 2.1, 2.2 and 3.6 in the Draft Strategy have a timeline of 2024, which is prior to the start date of the strategy. These actions should be deleted if they were completed in 2024, or if they have not yet been completed, the timeframes should be revised to 2025 or later. The indicator for Action 6.1 states, “The Disability Health Strategy is finalised and released before end 2024,” but the timeline for completion is 2026. Either the indicator or the timeline should be revised so they align.

¹¹ National Disability Insurance Scheme (2023), *Working Together to Deliver the NDIS: Independent Review of the National Disability insurance Scheme Final Report*, Canberra.

¹² Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability (2023), *Final Report — Volume 7: Inclusive education, Employment and Housing — Summary and Recommendations*, Canberra.

¹³ Homes Tasmania (2023), [Tasmanian Housing Strategy’s Action Plan \(2023-27\)](#).

TasCOSS also notes that some of the indicators in the Draft Strategy are not measurable, making it difficult to know when or if the associated actions have been achieved. For example, the indicator for Action 1.2 is: “The Tasmanian Government’s understanding of disability employment to enable targeted improvements is enhanced.” See also the Indicator for Action 6.2: “Improved public communications for people with disability.” We recommend that further work is undertaken, either for this Disability Strategy or for any associated action plans, to revise the indicators to ensure they are meaningful and measurable.

Please do not hesitate to contact me if you have any questions in relation to our feedback and recommendations. I look forward to the release of the finalised Disability Strategy and to seeing all of its actions implemented during 2025-27, with a particular focus on delivering a comprehensive system of Foundational Supports which is sufficient to meet the needs of all Tasmanians with disability.

Yours sincerely,



Adrienne Picone
Chief Executive Officer