



Tasmanian Council of Social Service Inc.

Disability Inclusion Plan — Discussion Paper

10 March 2026



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About TasCOSS

TasCOSS' vision is for one Tasmania, free of poverty and inequality where everyone has the same opportunity. Our mission is two-fold: to act as the peak body for the community services industry in Tasmania; and to challenge and change the systems, attitudes and behaviours that create poverty, inequality and exclusion.

Our membership includes individuals and organisations active in the provision of community services to Tasmanians on low incomes or living in vulnerable circumstances. TasCOSS represents the interests of our members and their service users to government, regulators, the media and the public. Through our advocacy and policy development, we draw attention to the causes of poverty and disadvantage, and promote the adoption of effective solutions to address these issues.

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Introduction

TasCOSS welcomes the opportunity to provide feedback in response to the *Towards a Tasmanian Disability Inclusion Plan — Discussion Paper (November 2025)* ‘(the Discussion Paper).’¹ The development of Tasmania’s first Disability Inclusion Plan ‘(the Plan)’ under the *Disability Rights, Inclusion and Safeguarding Act 2024* ‘(the Act)’² represents an important opportunity to embed a genuinely whole-of-government, rights-based approach to disability inclusion across Tasmania.

TasCOSS supports the intent of the Act and the Plan to promote and protect the human rights of people with disability, consistent with the *United Nations Convention on the Rights of Persons with Disabilities* and *Australia’s Disability Strategy 2021-31*.^{3 4} To ensure the Plan delivers meaningful and sustainable reform, this submission focusses on six interconnected areas, namely:

1. **Whole-of-government implementation;**
2. **Resourcing;**
3. **Accountability;**
4. **Transparency;**
5. **Alignment with the Commission of Inquiry reform agenda; and**
6. **The rights of children and young people with disability.**

In preparing the first Plan by 1 July 2026, the Government will need to ensure that governance, funding and accountability mechanisms are operational from commencement, so that implementation can proceed without delay.

TasCOSS recommends that the Tasmanian Government:

1. **Take a shared whole-of-government outcomes approach.**
2. **Establish a funded implementation plan.**
3. **Strengthen accessible communications.**
4. **Clearly articulate accountability.**
5. **Complement and reinforce the Commission of Inquiry recommendations.**
6. **Establish clear cross-system escalation pathways.**
7. **Include a workforce capability strategy.**

¹ Tasmanian Government (2025), [Towards a Tasmanian Disability Inclusion Plan — Discussion Paper](#), Department of Premier and Cabinet, November.

² [Disability Rights, Inclusion and Safeguarding Act 2024](#) (Tas).

³ Ibid

⁴ Australian Government, [Australia’s Disability Strategy 2021–2031](#).

Opportunities to Strengthen the Plan

Whole-of-Government Implementation

The Act requires that the Disability Inclusion Plan include policies and actions across all areas of the Tasmanian Government and ensure that defined entities understand and discharge their responsibilities for disability inclusion.² The Discussion Paper reiterates that inclusion must extend beyond disability-specific programs and that universal services must work together to achieve the Act's Objects and Principles.⁵

TasCOSS recommends an approach that is consistent with *Tasmania's Disability Strategy 2025–27*, which positions the Plan as the next stage in strengthening accountability and transparency under the Act.⁶ Is aligned with the NDIS Review's call for a 'unified ecosystem' of supports, with clearer interfaces between mainstream services and disability-specific supports, strengthened stewardship and clarified intergovernmental roles.⁷

Without clear governance architecture, there is a risk that inclusion remains siloed within disability portfolios rather than embedded across education, child safety, housing, transport, justice and health systems.

Recommendation:

- 1. TasCOSS recommends a shared whole-of-government outcomes approach with a clear lead agency for ownership of priority actions and defined reporting obligations for each agency.**

Resourcing

The Plan's success will depend on whether its actions are supported by adequate and sustained funding, workforce capability development and system reform. The Discussion Paper identifies persistent concerns raised by the disability community, including accessible information, advocacy demand, safeguarding gaps and service access challenges.⁸

The NDIS Review emphasises the need for foundational supports, early intervention and capacity-building outside individualised NDIS budgets, delivered through stronger mainstream systems.⁹ The

⁵ Tasmanian Government (2025), [Towards a Tasmanian Disability Inclusion Plan — Discussion Paper](#), Department of Premier and Cabinet, November.

⁶ [Disability Rights, Inclusion and Safeguarding Act 2024 \(Tas\)](#).

⁷ Australian Government (2023), Independent Review into the National Disability Insurance Scheme, [Working Together to Deliver the NDIS — Final Report](#).

⁸ Tasmanian Government (2025), [Towards a Tasmanian Disability Inclusion Plan — Discussion Paper](#), Department of Premier and Cabinet, November.

⁹ Australian Government (2023), Independent Review into the National Disability Insurance Scheme, [Working Together to Deliver the NDIS — Final Report](#).

Tasmanian Government Response to the Disability Royal Commission similarly commits to reforms that require sustained investment, including safeguarding, advocacy and oversight mechanisms.¹⁰

Recommendations:

- 2. Include a funded implementation plan that links each action to responsible agencies, identified funding sources, defined timeframes and transparent reporting.**
- 3. Invest in system capability by strengthening accessible communications and ICT procurement (including, but not limited to, WCAG 2.2 Level AA compliance, compatibility with screen readers and voice recognition software), and sustainable advocacy and complaints pathways.**

Accountability

The Act establishes a legislative framework intended to strengthen whole-of-government accountability for disability inclusion.¹¹ To give effect to this intent, the Plan should include:

- Measurable targets and performance indicators;
- Annual public reporting on progress;
- Disaggregated data reporting where possible; and
- Independent evaluation at mid-point and completion.

The NDIS Review recommends development of a Disability Outcomes Framework to measure progress across systems, reinforcing the importance of measurable outcomes.¹² *Tasmania's Disability Strategy 2025-27* also acknowledges the need to transition toward stronger accountability arrangements under the Act.¹³

The requirement that the first Plan be prepared by 1 July 2026¹⁴ creates an implementation risk if performance measures, baseline data and reporting architecture are not established in parallel.

Recommendation:

- 4. That accountability mechanisms be clearly articulated within the Plan's first year of operation.**

¹⁰ Tasmanian Government, [Tasmanian Government Response to the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability](#) (July 2024).

¹¹ [Disability Rights, Inclusion and Safeguarding Act 2024 \(Tas\)](#).

¹² Australian Government (2023), Independent Review into the National Disability Insurance Scheme, [Working Together to Deliver the NDIS – Final Report](#).

¹³ [Disability Rights, Inclusion and Safeguarding Act 2024 \(Tas\)](#).

¹⁴ Department of Premier and Cabinet (2025), [Towards a Tasmanian Disability Inclusion Plan - Discussion Paper](#), Tasmanian Government, (November).

Alignment with the Commission of Inquiry Reform Agenda

Children and young people with disability often experience overlapping risks across education, child safety, justice and health systems. The *Change for Children* strategy establishes a child-centred, integrated system framework that emphasises safeguarding, transparency and accountability¹⁵ particularly in relation to:

- Child-safe institutional practice;
- Integrated service delivery;
- Accessible complaints and advocacy; and
- Trauma-informed and rights-based approaches.

Recommendation:

5. **The Disability Inclusion Plan should explicitly articulate how it complements and reinforces the *Commission of Inquiry into the Tasmanian Government's Responses to Child Sexual Abuse in Institutional Settings* recommendations to reduce fragmentation and strengthen systemic safeguards.**

Rights of Children and Young People with Disability

The Act's Principles require recognition of dignity, autonomy, evolving capacity and supported decision-making.¹⁶ The Plan should translate these principles into practical commitments affecting children and young people with disability across education, health, housing, transport and justice systems (as a minimum).

Consistent with both the Disability Royal Commission and *Change for Children*,¹⁷ ¹⁸ the Plan should include:

- Clear safeguards regarding restrictive practices;
- Accessible, age-appropriate complaint mechanisms;
- Participation pathways for children and young people; and
- Transparent reporting on outcomes affecting children with disability.

Recommendations:

6. **That the Plan establish clear cross-system escalation pathways to ensure children and young people with disability do not fall between service systems when risks emerge.**
7. **Include a workforce capability strategy for all child-facing systems to strengthen disability-inclusive and trauma-informed practice.**

¹⁵ Tasmanian Government (2025), [Change for Children: Tasmania's 10 Year Strategy for Upholding the Rights of Children](#), Department of Premier and Cabinet, March.

¹⁶ [Disability Rights, Inclusion and Safeguarding Act 2024 \(Tas\)](#).

¹⁷ Tasmanian Government (2024), [Tasmanian Government Response to the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability](#), July.

¹⁸ Tasmanian Government (2025), [Change for Children: Tasmania's 10 Year Strategy for Upholding the Rights of Children](#), Department of Premier and Cabinet, March.

Conclusion

TasCOSS supports the development of Tasmania’s first Disability Inclusion Plan and recognises the significance of this reform moment. The Plan provides an opportunity to move beyond policy intent and embed disability inclusion as core government business across all systems.

To realise this opportunity, the Plan must be accompanied by clear whole-of-government governance, defined responsibility, sustainable resourcing, measurable outcomes and transparent public reporting. These elements are particularly critical given the requirement to finalise the first Plan by 1 July 2026.

A strong accountability and implementation framework established from the outset will ensure the Plan is not only compliant with legislative requirements, but capable of delivering durable and system-wide change.

TasCOSS looks forward to seeing a Plan that strengthens inclusion, safeguards rights and delivers practical improvements for people with disability across Tasmania.