

TasInsure Consultation
Department of Premier and Cabinet
Parliament House
HOBART TAS 7000

By email: tasinsure@dpac.tas.gov.au

Re: TasInsure Discussion Paper and TasInsure Company Bill 2025

Dear Madam or Sir

COTA Tasmania welcomes the Tasmanian Government's proposal to establish a state-owned general insurer (TasInsure) in response to escalating insurance costs faced by Tasmanian households, small businesses and community groups.

COTA supports the intent that TasInsure operate in a way that better reflects Tasmanian conditions and reinvests returns to support long-term affordability.

Please find attached our submission, which focuses on two priorities:

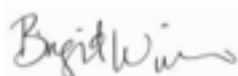
1. Older Tasmanians (especially 70+): ensuring information and services are clear and accessible and that older people are not excluded in practice by underwriting, pricing structures, excess settings or digital-only pathways.
2. Community organisations: addressing the growing problem of insurance being extraordinarily costly or not available at all, particularly for community/events insurance and public liability.

COTA supports the submission made by TasCOSS, and notes it's evidence that insurance inflation is materially outstripping both general inflation and sector indexation.

This reinforces the fact that the affordability problem is structural and is driving underinsurance/uninsurance, with disproportionate impacts on both people on fixed incomes and community services organisations.

COTA would welcome the opportunity to participate in targeted co-design with older people and the community sector as TasInsure's operating model and product suite are refined.

Yours sincerely



Brigid Wilkinson
Chief Executive Officer

9 January 2026

Submission: TasInsure Discussion Paper

1. Overview

COTA supports the Government's stated intent to respond to unsustainable insurance market conditions that are leaving many Tasmanians underinsured or uninsured.

We support the Bill's clear purpose of ensuring affordable insurance products are offered to Tasmanian individuals, business and community organisations.

The Bill also appropriately includes within scope both home and contents insurance for individuals and community/events insurance (including public liability).

This is directly relevant to COTA's two priority lenses: older people (70+), and community organisations.

However, the Discussion Paper and Bill are currently light on the operational safeguards that will determine whether TasInsure achieves "expanded coverage" in practice. This is particularly important for cohorts who are frequently excluded or face high friction in access, claims and renewals.

In addition, TasCOSS identifies that neither the Discussion Paper nor Draft Bill define what "community groups" are, the scope of "public liability", or whether charities and not-for-profits are clearly eligible.

This is an important clarity gap, especially to enable older consumers to avoid situations where they may be covered in theory but excluded in practice.

The Bill requires implementation of a Members' Statement of Expectations to specify strategic and policy expectations. COTA recommends that the Government use the Statement of Expectations (and early reporting) to lock in accessibility, fairness, and measurable outcomes for both older people and community organisations.

2. Recommendations

2.1 Older Tasmanians (especially 70+) - access, accessibility, and fairness

2.1.1 *Make older Tasmanians a visible priority cohort in TasInsure's implementation plan and reporting.*

The policy intent is affordability and expanded coverage for Tasmanian households.

To ensure this extends to older Tasmanians (including those in the 70+ age group), TasInsure's expectations and reporting should explicitly measure access and affordability outcomes for older customers.

2.1.2 *Embed "accessibility-by-design" service standards from day one.*

COTA recommends that TasInsure provides:

- phone and paper pathways (not digital-only),
- plain-English summaries and accessible formats (including large print), and
- supported claims navigation options.

2.1.3 Prevent age-based exclusion in practice.

COTA recommends that the Statement of Expectations explicitly require:

- no blanket age cutoffs, as many organisations relying on face issues with insurers that do not provide adequate cover/charge higher premiums for people over the age of seventy, and
- transparent underwriting/exclusions so older customers understand access and limits upfront.

2.2 Community organisations - availability, usability, and fit-for-purpose coverage

2.2.1 Confirm and publish clear eligibility requirements for charities, not-for-profits and incorporated associations.

TasCOSS notes it is unclear whether TasInsure products are intended to be available to many charities/not-for-profits that require cover.

COTA recommends TasInsure explicitly publish eligibility for (at minimum) the categories proposed by TasCOSS:

- SMEs and NGOs delivering services to the community
- charities and not-for-profit societies/associations/clubs
- community groups and incorporated bodies

2.2.2 Make “availability” a core success measure, not just premium levels.

TasInsure should publicly report (at least 6-monthly) on acceptance/decline rates and broad reasons for declinature for community organisations and event/public liability products—so “expanded coverage” is demonstrable.

2.2.3 Prioritise a fit-for-purpose community/events offer with simplified processes.

The Discussion Paper foreshadows simplified processes for community and events organisations.

COTA recommends an early “Community & Events Pack” featuring:

- quick certificates of currency,
- clear volunteer cover positions, and
- predictable renewal timeframes.

2.2.4 Ensure TasInsure addresses “hard” coverage gaps, not only cheaper versions of already-available products.

TasCOSS provides a concrete example of a coverage gap where market availability is failing: child sexual abuse / physical and sexual abuse (PSA) liability for organisations working with children, including concerns that public liability policies generally exclude abuse claims.

While COTA’s primary focus is older people and community organisations broadly, this example illustrates the wider principle that TasInsure should clearly identify and respond to high-need gaps where the market has withdrawn or priced cover beyond reach.

2.3 Near-term affordability measures – need to be considered at the outset

TasCOSS notes that around 21% of premiums are levies and highlights the option of removing Tasmania’s 10% insurance duty as an immediate premium-reduction lever.

COTA recommends that the Government considers such near-term affordability measures in at the outset, particularly for households on fixed incomes and for the community sector.

2.4 Assessment of other-jurisdiction models and the potential role of the TRMF.

TasCOSS suggests the Government consider underwriting cover for community organisations through Tasmanian Risk Management Fund (TRMF).

COTA supports the proposal for assessment of these complementary options as part of the overall solution, noting they may deliver quicker stability for essential service providers.

3. Governance, accountability and transparency

3.1. Members' Statement of Expectations

The Bill requires the Statement of Expectations to specify the members' strategic priorities and policy expectations.

COTA recommends this be the primary vehicle to mandate:

- older people access and accessibility standards;
- community organisations eligibility clarity; and
- public reporting on availability and affordability outcomes.

3.2 Keep definitions clear and, where needed, specify inclusions/exclusions

The Bill allows regulations to prescribe what falls within or is excluded from a class of insurance.

COTA recommends Government ensure any regulations or product definitions clearly articulate scope so community organisations (and older consumers) can readily understand what is and isn't covered.

Community insurance and events insurance (including public liability should be specifically included.

4. Suggested draft wording for the Members' Statement of Expectations (insert-ready)

Because section 16 allows members to set policy expectations for performance, COTA recommends including wording along these lines:

• Older Tasmanians (including 70+)

TasInsure will ensure older Tasmanians, including those aged 70 years and over, are not excluded from access to home and contents insurance through blanket age-based rules. Underwriting criteria and key exclusions will be transparent and communicated in plain language. TasInsure will provide accessible service channels, including telephone and paper-based options, and accessible formats (including large print).

• Community organisations

TasInsure will publish clear eligibility criteria for community organisations, including charities and not-for-profit societies, associations and clubs, and incorporated bodies.

TasInsure will prioritise community and events insurance (including public liability) and implement simplified processes, including timely certificates of currency.

• Outcomes reporting (availability + affordability)

TasInsure will report publicly (at least six-monthly) on access and affordability outcomes, including acceptance/decline rates and reasons categories, premium and excess trends, claims timeliness and complaints themes, with reporting designed to illuminate impacts on older customers and community organisations.