

Submission: Australian Government Consultation on the Inclusive Communities Fund

1. Overview

COTA Tasmania welcomes the Australian Government's commitment of \$200 million over three years to establish the Inclusive Communities Fund and supports its emphasis on strengthening the capability of mainstream community organisations to become more inclusive and accessible.

We particularly welcome the recognition that meaningful community participation is about more than simply enabling a person to attend an activity. Genuine inclusion involves belonging, relationships, choice and being recognised as a valued member of the community. The consultation paper similarly recognises the importance of addressing attitudinal as well as physical barriers.

COTA Tasmania's comments focus primarily on ensuring that the Fund works effectively for older people with disability, including people who are not NDIS participants; people on low incomes; and people living in regional, rural and remote communities.

2. About COTA Tasmania

Council on the Ageing (COTA) Tasmania is the leading voice for older Tasmanians. We work to advance the rights, interests and wellbeing of older people and to ensure that their experiences inform public policy, services and community decision-making.

Our work is grounded in the principle that older people should be able to live with dignity, independence and choice and to participate fully in the social, economic, cultural and civic life of their communities.

COTA Tasmania has a particular interest in the intersection between ageing and disability. Disability may be lifelong or acquired later in life, and many older people experience functional limitations or disability without identifying as a person with disability or being eligible for support through the National Disability Insurance Scheme (NDIS).

Policies designed to improve disability inclusion must therefore recognise the diversity of older people's circumstances and avoid assuming that disability support is synonymous with participation in the NDIS.

3. Detailed Comments

3.1 Older people with disability must not be overlooked

COTA Tasmania strongly supports the intention that the Fund should benefit all people with disability and not only NDIS participants. The consultation paper states that the Fund will provide greater opportunities for people with disability generally to participate in their communities.

This distinction is particularly important for older Australians.

People who acquire disability after the NDIS age threshold may instead receive services through the aged care system, while others may receive little or no formal support. Some older people may have significant mobility, sensory, cognitive or other functional limitations without considering themselves to be a “person with disability”.

The design, terminology and eligibility arrangements for the Fund should therefore avoid creating an implicit expectation that community organisations engage primarily with NDIS participants or NDIS providers.

Older people with disability should be explicitly identified as a priority population in implementation guidance, evaluation and reporting.

3.2 Address ageism as well as ableism

COTA Tasmania welcomes the Fund’s proposed focus on attitudinal barriers.

Community exclusion can result as much from attitudes, assumptions and organisational culture as from inaccessible buildings.

For older people with disability, these barriers can be compounded by ageism.

An older person may encounter assumptions that disability, isolation or reduced participation are an inevitable part of ageing, or that opportunities for recreation, learning, volunteering, cultural activity and community leadership are less important later in life.

Training and organisational capacity-building supported through the Fund should therefore incorporate an understanding of ageism and intersectionality, alongside disability awareness.

Success should not simply be measured by whether more people with disability attend activities. It should also consider whether people experience greater belonging, choice, participation and influence within their communities.

3.3 Transport and access are fundamental to participation

For people living in Tasmania, and in rural and remote areas more broadly, transport is one of the most significant determinants of whether community participation is possible at all.

COTA Tasmania is concerned that transport and other practical access supports may be treated as matters that should be addressed through existing programs rather than as integral elements of community inclusion.

The existence of a transport service elsewhere in the system does not mean that an individual has meaningful access to transport. A service may not operate in their area, may not run at the required time, may be unaffordable, may not accommodate mobility needs, or may require multiple connections that make a relatively simple community activity impractical.

For older people and people with disability, these barriers can be compounded by reduced mobility, inability to drive, limited access to private vehicles, poor pedestrian infrastructure and the absence of accessible public transport.

These issues are particularly acute in rural, regional and remote communities, where distances are greater, services are fewer and community transport is often limited or reliant on volunteers.

Accessibility should therefore be understood broadly. It is not sufficient for a venue, activity or organisation to be physically accessible if people cannot reasonably and safely reach it.

The Inclusive Communities Fund should allow projects to address the full pathway to participation, including transport, physical access, wayfinding, scheduling, and other practical barriers. Funding guidelines should avoid assuming that these needs are adequately met through other portfolios or programs.

In rural and remote areas, the Fund should also recognise that the cost of achieving inclusion may be higher because of distance, smaller service markets and limited infrastructure. Funding models should take these additional costs into account rather than applying metropolitan assumptions to all communities.

3.4 Ensure the Fund works outside metropolitan Australia

COTA Tasmania strongly welcomes the consultation paper's specific question about ensuring participation regardless of whether people live in metropolitan, regional, rural or remote areas.

Funding models based primarily on competitive grant applications can inadvertently favour larger organisations with dedicated staff, established grant-writing expertise and greater administrative capacity.

The organisations most capable of creating meaningful inclusion in smaller communities may instead be volunteer-run sporting clubs, neighbourhood houses, cultural organisations, local interest groups, Men's Sheds, community gardens, service clubs, and other small community organisations.

These organisations should not be excluded in practice because they lack sophisticated grant-writing or administrative resources.

COTA Tasmania supports:

- a dedicated small-grants stream;
- simple application processes;
- proportionate reporting and acquittal requirements;
- support for organisations to develop suitable proposals;
- recognition of volunteer and in-kind contributions; and
- monitoring of the geographical distribution of funding.

Funding assessment should recognise local impact rather than simply scale.

3.5 Digital inclusion - but not digital-only inclusion

Digital technology can substantially improve participation for people whose mobility, health, transport or geographic circumstances make face-to-face participation difficult.

The Fund should therefore support organisations to improve digital accessibility, including accessible websites, online information, registration systems, and hybrid participation.

However, digital systems can themselves create barriers.

Older people are disproportionately affected by digital exclusion, including lack of confidence, affordability, connectivity and accessible technology. Increasing concerns about scams and online security can also make some people reluctant to use digital services.

Inclusive community organisations should therefore be encouraged to offer digital options in addition to, rather than instead of, appropriate telephone, face-to-face and other non-digital pathways.

3.6 The role of local government

Local governments have an important role in creating inclusive and age-friendly communities.

Councils own or operate many of the places in which community participation occurs, including libraries, community centres, halls, recreational facilities, parks and public spaces. They also have extensive relationships with community organisations and volunteer networks.

The Fund should encourage councils to act as convenors, partners and sources of local knowledge. However, COTA Tasmania would not support a model under which local government becomes the default funding intermediary or gatekeeper.

Capacity, resources and priorities vary considerably between councils. Community organisations should retain the ability to seek funding directly, particularly where they are well placed to identify and respond to the needs of their own communities.

3.7 Building sustainable change

COTA Tasmania supports the intention that the Fund should build sustainable organisational capability rather than create services which disappear when grant funding ends. The consultation paper proposes support for activities such as training, expert advice, partnerships and small accessibility purchases and states that the Fund is not expected to pay for direct service delivery.

There should nevertheless be some flexibility in applying this distinction. For some organisations, the most effective way to learn how to become genuinely inclusive will be to test a new approach with people with disability and refine it through experience.

COTA Tasmania therefore recommends that the Fund allow limited pilot or demonstration activities where these are integral to capacity-building and where there is a clear pathway to embedding the resulting practice within the organisation's ongoing activities.

This would maintain the Fund's focus on sustainable change without creating an artificial distinction between organisational development and practical implementation.

4. Recommendations

COTA Tasmania recommends that the Inclusive Communities Fund:

- explicitly recognise older people with disability, including people who are not NDIS participants and people receiving support through the aged care system;

- adopt an intersectional approach which recognises the combined effects of ageism, ableism, financial disadvantage and other barriers to participation;
- recognise transport, geographic isolation and physical accessibility as core determinants of community participation, particularly in rural, regional and remote areas, and permit funding to address practical access barriers where they are not otherwise effectively met
- include a simple and proportionate small-grants stream accessible to small, volunteer-led and regional community organisations;
- include mechanisms to ensure an equitable geographic distribution of funding, including to regional, rural and remote communities;
- support accessible digital participation while requiring organisations to maintain appropriate non-digital pathways;
- use local governments as important partners and enablers, without making them the sole gatekeepers for local funding or participation; and
- allow limited pilot or demonstration activities where these are necessary to establish and embed sustainable inclusive practices.

5. Conclusion

COTA Tasmania supports the objectives of the Inclusive Communities Fund and its emphasis on enabling people with disability to participate meaningfully in ordinary community life.

The Fund represents an opportunity to make inclusion part of the everyday practice of community organisations rather than something delivered through separate or specialist programs. To realise that opportunity, its design must recognise the diversity of people with disability and the communities in which they live.

For older people in particular, inclusion policy must extend beyond the NDIS and recognise the interaction between disability, ageing, ageism, transport, digital exclusion, income, and geographic disadvantage.

A Fund which is locally responsive, easy for small organisations to access and focused on meaningful belonging rather than simply attendance could make an important and lasting contribution to stronger, more inclusive communities.