

Local Government Reform Team
Department of Premier and Cabinet (DPAC)
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Subject: Submission on the *Local Government Amendment (Targeted Reform) Bill 2025 – Exposure Draft*

Dear Local Government Reform Team,

Please find enclosed COTA Tasmania's submission on the *Local Government Amendment (Targeted Reform) Bill 2025 – Exposure Draft*.

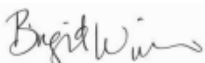
COTA Tasmania welcomes the Exposure Draft as a step toward more transparent, accountable, and responsive councils. We support the reform architecture and recommend that the Bill's implementation instruments (Ministerial Charters, Orders, regulations, and guidance) must operationalise age-friendly and digitally inclusive practice - so older Tasmanians can access services offline as well as online, be heard in decisions, and see results in published data.

In particular, we recommend that:

- age-friendly principles be embedded in the Ministerial Charter and supporting instruments; and
- engagement and customer-service standards include phone and in-person options with accessible formats; and
- council performance reporting include age-disaggregated indicators for accessibility, digital inclusion, transport, emergency readiness, and service resolution.

We would welcome the opportunity to work with DPAC on the co-design of Orders, guidance and templates that bring these reforms to life across all Tasmanian Councils.

Yours sincerely,



Brigid Wilkinson
CEO

14th November 2025

Submission:

Local Government Amendment (Targeted Reform) Bill 2025 – Exposure Draft

1. About COTA Tasmania

COTA Tasmania (Council on the Ageing [Tas] Inc) has been the leading voice of older Tasmanians for more than 60 years. We operate as a peak body for a wide range of organisations and individuals who are committed to encouraging our community to think positively about ageing. This involves promoting and encouraging social inclusion, and championing the rights and interests of Tasmanians as they age.

We value the diverse voices of older Tasmanians, and we learn from their experiences. We look forward to a time where age is not seen as a barrier, but instead as a positive contributor to the unique fabric of lutruwita, Tasmania.

Older Tasmanians deserve to be heard and afforded equity of services, opportunities, and representation. We can expect to live longer, healthier lives and we all have a role to play in making decisions that will support us age well. Many inequalities experienced by Tasmanians do not end as people age – indeed, in many cases, they increase. This is especially relevant recognising the fact that ageing and disability are integrally connected.

2. Our response

COTA Tasmania welcomes the Exposure Draft as a step toward more transparent, accountable, and responsive councils. We support the intent and architecture of the reform and recommend strengthening the Bill's implementation instruments (Ministerial Charters, Orders, regulations, and guidance) so that age-friendly and digitally inclusive principles are explicitly embedded and consistently applied across every council.

In practice, this means minimum standards for offline as well as online access (plain-English, large-print/Easy Read materials; phone and in-person lodgement; captioned livestreams and call-in lines), clear rates/hardship information on every notice, mandatory councillor learning and development on ageism, elder-abuse awareness and digital inclusion, and age-disaggregated performance reporting so we can see whether older Tasmanians, who are over-represented among the digitally excluded, are being reached.

3. Why this matters

- Tasmania is older than the rest of the nation: in 2023, about 40% of Tasmanians were 50+ (37% in Greater Hobart; 45% in the rest of the state) and ~21% are 65+.
- Tasmania ranked last for digital inclusion in the 2025 Australian Digital Inclusion Index (ADII) and is the worst-performing state for Affordability and Digital Ability (only the NT is worse for Access).
- Older cohorts are most at risk: in the ADII 2025, people 75+ have the highest exclusion rates (66.5%), with persistent gaps in Digital Ability outside capitals.

- Affordability pressure is real for older people: national ADII commentary identifies ongoing affordability stress in this demographic, and notes that older Australians 55–75+ are among the most likely to spend >10% of income on internet access and have the largest Digital Ability gaps (–15.5 to –32.1 vs national average).
- Many Tasmanians remain offline or under-connected: TasCOSS estimates ~1 in 5 Tasmanians (~119,000 people) face at least one barrier (access, affordability, skills) and ~53,000 are highly digitally excluded.
- A review of digital inclusion in Tasmania undertaken for the state government in late 2024 confirms this gap. Tasmania’s ADII score has trailed the national average in recent years, underlining structural, not temporary, disadvantage.

4. Our recommendations

4.1 Ministerial Charter & role of councils - embed age-friendly principles

COTA believe that the Ministerial Charter (and supporting Orders) must reference age-friendly community principles, including universal design, accessibility, equity, and inter-generational wellbeing - and include explicit collaboration duties with health, transport, and community services relied upon by older residents.

In order to assist councils in meeting new expectations and standards, the government should consider funding shared services (eg captioning contracts, template packs, analytics), micro-grants for hardware (hearing loops, cameras), and regional training delivered with LGAT/COTA.

4.2 Strategic planning & engagement - make offline access mandatory

COTA strongly supports mandatory community-engagement strategies with minimum standards set by Order, including:

- plain-English summaries and Easy Read/large-print formats,
- phone and in-person lodgement options,
- scheduled pop-ups in seniors’ centres and residential aged care,
- captioned livestreams and hybrid attendance options, and
- reporting that disaggregates participation by age and shows how feedback changed decisions.

Examples of relevant minimum standards could include:

- Service level: phone wait times ≤ 5 minutes during business hours; call-backs within 1 business day.
- Document accessibility: major consultations to include A4 2-page plain-English summary and Easy Read; 14-point minimum for printed materials.
- Event accessibility: all open meetings livestreamed with captions + call-in number; recordings online within 48 hours; printed transcripts on request within 5 business days.
- Reach & inclusion: at least 2 in-person pop-ups per major consultation (one in a seniors’ hub or residential aged care).
- Reporting: age-band participation (50–64, 65–74, 75+) and “what we changed” table published with final decision.

4.3 Performance reporting - publish age-disaggregated indicators

COTA strongly supports introduction of consistent council performance reporting metrics, with DPAC specifications requiring age-split metrics for:

- footpath and facility accessibility,
- community transport coverage and reliability,
- digital support at libraries and service centres,
- approvals that enable ageing in place (eg accessibility modifications),
- emergency readiness for heat/smoke events, and
- time-to-resolve service requests from older residents.

4.4 Rates notices - make concessions and hardship provisions unmissable

COTA believes the government should use the Bill's head of power over content of rates notices to require every rate notice to include prominent information about:

- pensioner remissions/concessions,
- hardship policies,
- payment plans,
- how to apply by phone or in person, and
- availability of accessible formats.

Content that should be prominent on rates notices includes:

- Pensioner remissions/concessions – clear eligibility and phone application process
- Hardship policy & payment plans – phone/in-person pathways
- Availability of accessible formats (large print, Easy Read)
- Customer service phone and walk-in locations (hours, accessibility features)
- Statement of language/interpretation support eg front page placement, minimum 15% of surface area, bordered box.

4.5 Internal audit - include accessibility and equity in programs

COTA strongly supports mandating internal audit for councils, with an explicit requirement that programs cover service accessibility and equity not just in the areas of finance and compliance but across all programs.

This includes:

- accessibility of facilities,
- inclusivity in communications,
- timeliness/quality of home-maintenance programs, and
- the reach of emergency warnings to people without smartphones.

4.6 Councillor learning and development - core modules

COTA strongly supports core and ongoing learning and development for elected representatives, with a continuing professional development (CPD) requirement.

A suggested CPD framework could include 6 hours pa ongoing, with a 4-year renewal cycle aligned with council election terms. Council websites should publish councillor learning and development updates at least quarterly, and these reports should be auditable by the Director of Local Government.

We specifically support the introduction of mandatory modules on:

- ageism and respectful engagement,
- elder-abuse awareness and referral pathways,
- digital inclusion and offline access standards,
- practical engagement with older residents, and
- emergency management for heat and smoke impacts.

4.7 *Serious councillor misconduct - accessible, fair process*

COTA strongly supports establishment of a clearer and more transparent process to address egregious behaviour with natural-justice protections and accessible lodgement eg phone/in-person options, status updates in plain English, accessible hearing formats, and publication of de-identified determinations to build public trust.

4.8 *Early-intervention tools and temporary advisors—transparency on scope and cost*

COTA strongly supports performance-improvement directions and temporary advisors, with safeguards requiring publication of scope, timeframes and periodic progress reports, and disclosure of costs so ratepayers understand value for money.

4.9 *Meetings and remote attendance - mirror accessibility for the public*

Councillors can attend council meetings remotely, so it is only fair that ratepayers and the general public should be offered similar access. At the very least, there should be at least one non-digital participation channel per open meeting (eg call-in).

This requires councils to ensure best practice on-line meeting procedures such as captions, call-in lines, recorded archives for open meetings, and making printed copies of transcripts available on request.

This will maintain visibility and participation opportunities for residents who are offline or hearing-impaired.

4.10 *Climate resilience and emergencies - older-people impact assessments*

Where the Bill and its instruments reference planning for climate impacts, councils should be required to include older-people impact assessments in emergency management and infrastructure upgrades (eg heat refuges, shading, smoke-safe indoor spaces, and communications suitable for non-digital residents).

In order to make these deliverables tangible, each council should be required to supply a short Older-People Impact Statement for each municipal emergency plan and major infrastructure upgrade, covering (among other things) heat refuges, shade, smoke-safe spaces, non-digital alerts, and continuity of essential services (toilets, potable water) during outages. These plans should be reviewed biennially.

5. Conclusion

Overall, COTA supports the Exposure Draft.

However, we believe some additional steps would reduce the disproportionate challenges faced by older people when dealing with local government in Tasmania and deliver fairer, earlier, and systemic inclusion.

Older Tasmanians are over-represented among the digitally excluded. To deliver real-world impact for them, we propose:

- minimum offline access standards for engagement and customer service,
- a rates notice “access & hardship” panel on every bill,
- mandatory councillor learning on ageism, elder abuse, digital inclusion, and emergencies,
- age-disaggregated performance reporting using a DPAC template, and
- time-bound implementation, with support for small councils.

Without mandated offline parity and age-split reporting, reforms risk widening the gap for older Tasmanians.

We would welcome the opportunity to work with DPAC and LGAT on co-designing the Orders, guidance and templates that bring these reforms to life.