

SUBMISSION TO THE

State Disability Inclusion Plan 2025 - 2029

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Submission authorised by

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Introduction

COTA SA welcomes the opportunity to provide a submission on the Draft State Disability Inclusion Plan 2025-2029. COTA SA is an older people's movement run by, for and with older people. We are the peak body representing the rights, interests, and futures of over 700,000 older South Australians aged 50+. We engage widely with older South Australians across the state and the lived experiences of the diverse community shape and inform COTA SA's policy and advocacy work.

Our population is ageing. In June 2020, approximately 16% of Australians were aged 65 and over and this is projected to rise to 21-23% by 2066¹. Our ageing population should be a major driver to ensure that older people with disability are not overlooked but actively included in South Australia's disability inclusion efforts.

COTA SA cares deeply about ageing well and is committed to ensuring older South Australians have the opportunity, capacity and ability to navigate the changes of ageing in their place of choice. We have responded to the draft plan where we feel we can meaningfully contribute to decisions that could improve the quality of life for older South Australians for the next generation.

¹ [Older Australians, About - Australian Institute of Health and Welfare](#)

Key Issues and Opportunities

Embedding an Ageing Lens in the State Disability Inclusion Framework

Older South Australians represent one of the largest and most rapidly growing cohorts of people living with a disability. In 2022, 52.3% of people aged 65 years and over had a disability, compared with just 15% of people aged 0-64². Despite this demographic reality, the Draft State Disability Inclusion Plan does not explicitly acknowledge the ageing population as a priority group.

The Plan sets out a vision to ensure that no one is left behind, yet older South Australians living with a disability experience distinct and often compounding barriers, including ageism, digital exclusion and difficulties accessing appropriate services and support. Without explicit recognition, there is a risk that needs of this cohort will be overlooked. Applying an ageing lens across all population groups, domains, and actions is essential to ensure this cohort is recognised and included.

An ageing lens helps address both age-related disability and the dynamic way people experience disability as they grow older. It ensures that age-specific needs, such as increased risk of dementia, mobility challenges and co-morbidities, are integrated into service planning and policy responses. This approach mirrors how other forms of intersectionality (such as gender or cultural background) are addressed in the plan, by ensuring tailored responses across all areas. It acknowledges that disability is not fixed or static, but can be acquired at any stage of life, particularly in later years. Without this approach, the plan risks delivering policies and reforms that overlook a significant and growing segment of South Australians.

It's also important to recognise that if we get things right for older people, it benefits everyone. By designing systems and services that work for older South Australians who often experience multiple, overlapping barriers; physical, cognitive and digital, we create more resilient, flexible and accessible solutions for people of all ages and abilities.

Recommendation: Apply a clear and consistent ageing lens across all domains, priority populations and implementation actions, ensuring that older people's needs and lived experience are reflected throughout all stages of life.

Representation of Older People in Co-design and Governance

The Draft State Disability Inclusion Plan highlights the importance of embedding lived experience in government decision-making, particularly under *Domain 1: Access, Priority Area 7 (P.16)*. While this is a welcome inclusion, the mechanisms outlined such as public consultations and working groups will fall short unless older people living with a disability are deliberately and systematically included.

² [Disability, Ageing and Carers, Australia: Summary of Findings, 2022 | Australian Bureau of Statistics](#)

Despite being the largest cohort of people living with a disability in South Australia, older people often face barriers to participation. These include mobility limitations, digital exclusion, and a lack of targeted outreach in aged care settings or regional communities. Without intentional inclusion, their perspectives risk being overlooked in reforms intended to benefit all people living with a disability.

To meet the Plan's own commitment to inclusive engagement, older people living with a disability should be deliberately represented in advisory structures like the Disability Minister's Advisory Council (DMAC) and actively engaged in Disability Access and Inclusion Plan (DAIP) consultations. Age-responsive engagement strategies such as face-to-face outreach, partnerships with aged care providers, and alternative formats are essential to ensure older people's voices are heard and valued.

Recommendation: Ensure older people living with a disability are deliberately and visibly included in consultation, co-design and governance mechanisms related to the Plan's implementation and evaluation, including DMAC and DAIP processes.

Service Integration and System Navigation

COTA SA frequently hears from older South Australians about the challenges they face when navigating multiple essential services as they age. These difficulties become even more complex when an older person living with disability must also engage with additional, disability-specific services. Individuals are often required to move between the aged care, disability, and health systems each with distinct entry points, eligibility criteria, and administrative processes. This fragmentation can cause confusion and distress, particularly during times of crisis or deteriorating health.

The lived experiences of older people offer valuable insights into how service navigation can be improved. Embedding these perspectives into integration efforts can help shape more person-centred and efficient service pathways. Service integration is critical for reducing barriers and ensuring continuity of care.

While the draft plan refers to access to personal and community supports (Domain 3: Support) and integrated health care pathways (Domain 4: Wellbeing), it lacks a clear strategy to address the complex coordination challenges experienced by older people navigating multiple service systems across the state, especially those transitioning between the NDIS, aged care, and health sectors. COTA SA continues to hear that older South Australians are faced with multiple, complex decisions as they age³.

³ [COTA SA, State Budget Recommendations 2025-26](#)

This often results in confusion about where and how to access appropriate advice and support. COTA SA has extensive experience delivering a range of navigation programs with and for older people and we see a strong opportunity for the plan to incorporate a dedicated navigation support strategy aligned with Domain 4, Priority Area 3.1: *“Total number of pathways in place for people with disability that provide an option of tailored coordination and navigation to meet their needs.”*

To support seamless service access, the Plan should also promote cross-sector collaboration, shared funding models, and joint planning across systems such as the NDIS and My Aged Care. These measures would help reduce duplication and improve outcomes for older people who rely on multiple systems to maintain their independence and wellbeing.

Recommendation:

Strengthen navigation and coordination between aged care, disability, and health systems to support continuity of care for older people living with a disability. This should include targeted actions under Domain 3 (Support) and Domain 4 (Wellbeing), with improved alignment between services such as the NDIS and Aged Care.

Data Gaps and Inclusive Measurement

The Draft State Disability Inclusion Plan commits to improving accountability through its Outcomes Framework and highlights the priority of data and reporting (p.20). However, without age-disaggregated data, it will be difficult to determine whether older people living with a disability are being effectively reached or supported through the Plan’s initiatives.

This lack of visibility risks masking disparities and may undermine the Plan’s broader inclusion goals. While general prevalence data is cited, it does not provide the level of insight required to inform age-responsive planning, investment, or evaluation. Older South Australians, who represent more than half of the state’s disability population, will remain functionally invisible in measurement and reporting processes if data is not broken down by age.

To support this inclusion, data collection must be disaggregated by age and extend beyond prevalence. It should capture indicators such as service access, unmet needs, satisfaction, and wellbeing across age cohorts. Publicly reporting on these outcomes will support transparency, enable continuous improvement, and ensure accountability for delivering equitable outcomes across the lifespan.

Recommendation: Ensure the Outcomes Framework includes age-disaggregated data and meaningful indicators of progress for older people living with a disability, particularly in relation to service access, unmet needs, and wellbeing. Commit to public reporting to support transparency and continuous improvement.

Summary of Recommendations

COTA SA makes the following recommendations to strengthen the Draft State Disability Inclusion Plan 2025-2029:

1. **Apply a clear and consistent ageing lens across all aspects of the Plan:** Embed an ageing lens across domains, priority groups, and implementation actions to ensure the needs, experiences and perspectives of older people living with disability are reflected throughout.
2. **Include older people living with a disability in consultation, co-design and governance:** Ensure the visible and meaningful inclusion of older South Australians in advisory structures such as DMAC and in the development and evaluation of DAIPs, supported by age-appropriate engagement strategies.
3. **Strengthen service integration and navigation supports:** Improve coordination between aged care, disability, and health systems to reduce duplication and confusion.
4. **Collect and report age-disaggregated data in the Outcomes Framework:** Ensure the collection and public reporting of age-disaggregated data across service access, unmet needs, satisfaction, and wellbeing. This will support accountability and continuous improvement and allow the Plan's progress to be meaningfully tracked for older people living with a disability.

In closing and for future discussion

South Australia has the opportunity to lead the nation in building a genuinely inclusive society - one where people of all ages and abilities are supported to live with dignity, choice, and connection. Older South Australians represent a significant and growing proportion of people living with a disability. Yet without deliberate inclusion in the final State Disability Inclusion Plan, their voices, experiences and needs risk being overlooked. The Plan's vision of "a South Australia where no one is left behind" cannot be realised unless older people living with a disability are seen, heard, and actively included.

COTA SA urges the Government to adopt an ageing lens to disability inclusion reflecting the reality that disability can be acquired at any age, and that accessible, inclusive systems must evolve with people as they age.

We thank the Department of Human Services for the opportunity to contribute to this important consultation and welcome continued collaboration to ensure that the final Plan is strategic, inclusive, and effective for all South Australians. Please contact Chief Executive Miranda Starke in the first instance for further discussion.

Acknowledgement of Country

COTA SA acknowledges and respects Aboriginal people as the traditional custodians of the land of South Australia. We honour Aboriginal peoples' continuing connection to Country and recognise that their sovereignty was never ceded. We pay our respects to First Nations Elders past, present, and emerging and extend that respect to all Aboriginal people.