



Brotherhood of St. Laurence
Working for an Australia free of poverty

Victorian State Disability Plan

Submission to Office for Disability, Department of Families, Fairness and Housing

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Summary

The Brotherhood of St. Laurence (BSL) welcomes the opportunity to provide input to the consultation for the next Victorian State Disability Plan (the Plan). BSL is a social justice organisation working towards an Australia free of poverty. Our purpose is to advance a fair Australia through our leadership on policy reform, our partnerships with communities and the quality of our services. Our approach is informed directly by people experiencing disadvantage and uses evidence drawn from our research, together with insights from our programs and services, to develop practical solutions that work.

In BSL's view, an inclusive society is one where people face no barriers to participating in economic, cultural, civic and social life to the degree that they choose. Diversity is embraced and people can access support, have a voice, and feel valued and respected. Economic, social and political systems enable people to flourish and live with dignity, through broad civic engagement.

BSL has operated as a National Disability Insurance Scheme (NDIS) Partner in the Community (PITC) since 2016. We are contracted by the National Disability Insurance Agency (NDIA) to deliver Local Area Coordination (LAC) and the early childhood approach in Victoria across North Eastern Melbourne, Hume/Merri-bek, Brimbank/Melton, Western Melbourne and Bayside Peninsula areas. This work includes building community capacity and inclusion through place-based projects.

This submission draws on our long-term practical experience across programs, service development and innovation initiatives and insights drawn from our research and policy analysis. It covers core

areas of concern that remain ongoing challenges to inclusion for people with disability, as well as issues related to policy reforms in the disability space.

This consultation is being undertaken at a time of significant uncertainty for the disability community. The NDIS reforms currently in train will reshape disability supports in Australia, with changes to the role of states and territories. While many of the details are yet to be finalised State and Territory Disability Ministers have already raised concerns about the pressure that the NDIS reforms may place on disability services, and flagged the potential for gaps in service delivery and increased difficulties for people with disability to access services.¹ The Plan will need to deal with the impact of changes to social and community participation supports, the shifting role of the State in delivering Foundational Supports, and the introduction of Thriving Kids among other changes. There are also ongoing challenges related to staffing the disability sector that may be compounded by shifts in service delivery from the federal to the state government. These challenges are significant, and the next Plan must address them directly.

Significant improvements have been achieved under the 2022–26 Inclusive Victoria: State Disability Plan, with gains in each of the pillar areas for the Plan that should be celebrated.

As stated in the consultation document, ‘The purpose of a state disability plan is to:

- improve the lives of people with disability
- make our community more inclusive.’

In line with this objective and views sought by the Victorian Government through this process, BSL recommends the following to improve the lives of Victorians with disability and create a more inclusive community.

Recommendations

Recommendation 1: Government should renew its efforts to improve transport accessibility.

Recommendation 2: Government should develop a clear plan to address workforce issues across the sector so that support staff and allied health professionals are accessible to everyone who needs them.

Recommendation 3: Government should build inclusive mainstream settings to support Victorians with disability. Inclusive mainstream settings are a critical component of providing equal opportunities to Victorians with disability and should be appropriately funded in addition to the resources directed to Foundational Supports.

Recommendation 4: Government should deliver a more integrated transition from education to employment for young people with disability entering the labour market.

¹ State and Territory Disability Ministers (2026) *Submission to the Senate Standing Community Affairs Legislation Committee: National Disability Insurance Scheme Amendment (Securing the NDIS for Future Generations) Bill 2026*

Recommendation 5: Government should increase opportunities for people with disability to lead, influence and shape decision-making processes across government, community organisations, education, employment and civic life.

Recommendation 6: Where possible government must ensure enough time is given for changes to be properly communicated and implemented.

Recommendation 7: Government must dedicate resources to keeping people connected to supports and included in the community during the current transition period.

1 Key considerations for the next Victorian State Disability Plan

The new Plan will come at a time of transition in disability services and supports in Victoria and around the country. Given changes to the NDIS that are being implemented and those under consideration by the federal parliament, there is uncertainty about how support for people with disability is going to change.

The changes offer an opportunity to address gaps in the supports available to ensure inclusivity and present a risk in how changes may impact access to supports for Victorians with disability. How Victoria handles this transition period will impact the wider community. Government must provide certainty to those who are unsure about what supports are going to look like to help address anxiety in the disability community.

During any period of change in service provision, government must ensure that gaps in services and supports do not emerge to leave vulnerable members of the community behind. The NDIS changes mean the structure and accessibility of community supports will need to be carefully monitored. Government must be proactive to ensure people do not slip between any systems gaps that may arise during the design and implementation of services.

2 BSL comments on topic areas

Inclusive communities

Social and community participation are important drivers of community inclusivity, and help prevent isolation and segregation. They can also play an important role in helping people transition to employment. As the federal government is proposing to reduce NDIS social and community participation supports from October 2026, the forthcoming Plan should address how Victoria can increase levels of social and community participation among people with disability to ensure people with disability are not isolated.

Transport inclusivity is an important factor shaping access to social and community participation and it should continue as a priority in the new plan. Despite some progress, the pace of accessibility upgrades and availability of transport in some areas needs to accelerate. In addition, the NDIS reforms will increase the importance of transport inclusivity within Victoria. Flexibility in how NDIS

funding can be used has, until recently, enabled some people to address gaps in transport accessibility. However, changes to the funding model, which may lower the amount of transport and community participation funding available, have the potential to amplify the impact of transport barriers in the community and affect people's access to community supports.

The recent Victorian Auditor General's Office report,² *Accessibility of Tram Services*, has flagged that progress on increasing the inclusivity of the Melbourne tram network remains slow. They estimate only 18 per cent of tram services were accessible, and the state was at risk of not meeting the 2032 target for *Disability Standards for Accessible Public Transport 2002*.

Reports from BSL program staff note accessibility of public transport remains a factor in shaping transport choices available to people with disability and influences whether clients are able to access community-based services and supports. At train stations, clients have reported issues related to accessing information and communications, physical accessibility across the journey, inclusion, attitudes and support, and accessibility during service disruptions.

Problems related to accessing information and communications reported included limited access to maps, visual information, wayfinding tools and station-specific accessibility information, making it more difficult to plan and navigate journeys confidently. Physical accessibility across the journey extends beyond trains themselves to include other things like the length of travel from the accessibility car park to platforms without a bench to stop on, limited accessible parking and drop-off locations, and some safety concerns around isolated lift locations and poor lighting. Interactions with staff and other passengers influenced the experiences of public transport. Issues include at times a need for increased community understanding of accessible and priority seating and shared public transport etiquette, however, interactions with staff and other passengers also offered a space for positive experiences where staff were supportive and able to assist passengers. Service disruptions also presented additional barriers and uncertainty for passengers.

Recommendation 1: Government should renew its efforts to improve transport accessibility.

Health, housing and wellbeing

For health, housing and wellbeing, workforce planning needs to ensure there will be adequate staffing capacity to address the needs of the community. The success of any major human services reform depends on its workforce and overall capacity and capability to deliver services. The Plan will need to address how potential shortfalls in staffing will be avoided, not only in relation to how staffing capacity will impact services the state plans to deliver, but also how changes at the federal level might impact likely increased demand. In turn, the state may need to consider how it staffs different roles, how existing expertise is allocated across different roles, and what is needed to support workforce sectors that are undersupplied.

² VAGO (2025) 'Accessibility of tram services: follow up', Victorian Auditor General's Office, Melbourne. Tabled: 19 November 2025. <https://www.audit.vic.gov.au/report/accessibility-tram-services-follow>

Within the last five years, significant parts of the disability sector and allied health workforce have experienced workforce shortages.³ There have been shortages of occupational therapists, disability support officers, aged or disabled carers, registered nurses (in developmental disability and disability and rehabilitation),⁴ which, for some parts of the community, has made it difficult to access services and has inflated pricing.

Staff turnover must also be considered when addressing challenges related to the disability workforce. The most recent National Disability Services workforce census data⁵ highlights that staff turnover remains a significant issue in the Australian disability workforce, especially for workers in casual roles, which are growing as a proportion of the roles in the sector. High rates of staff turnover present a financial burden to providers⁶ and can negatively impact service quality. Rates of turnover in Victoria for casual staff are at 23%, while rates of turnover for permanent roles are at 12%. The same data highlighted that 52% of people leaving roles did so to move out of the disability sector.

The high rate of staff, including allied health, leaving the sector needs to be addressed. Addressing staff turnover is important because it threatens service continuity and market diversity, as well as reducing service availability, limiting choice for people with disability and impacting the capacity of organisations to invest in quality, innovation and workforce development. While to date these issues have predominantly related to the NDIS, as the reforms shift some services and community supports from federal to state delivery, these will now be issues that the state must address.

Multiple actions may be undertaken to address the challenge of workforce capacity across the disability sector. Victoria has already introduced priority qualifications through Vocational Education and Training (VET), which may meet some of the staffing capacity demand. Other opportunities to strengthen workforce development to meet growing need include expanding earn while you learn approaches to support career transition into qualified disability roles, developing cross-occupational training products that reflect emerging roles (i.e. navigators) and support career mobility and specialisation across the sector, and investing in train-the-trainer initiatives that build VET educator expertise in person-centred and integrated care practices so that new workforce entrants have work ready skills and familiarity with the most current practices. Creating higher-level qualifications and new qualifications specific to roles that support the system may also address some workforce capacity gaps. For example, new qualifications may be needed to build clearer pathways for emerging roles that provide a system navigation function (the importance of these roles is discussed further below). There is also a need to consider how to reduce staff turnover, whether through improving working conditions or through increased employment security for roles where casualisation is impacting staff turnover.

³ HumanAbility (2026) *Aged Care, Disability, Leisure and Health Functional Analysis Report*
<https://humanability.com.au/projects/aged-care--disability--leisure-and-health-qualification-rev.aspx>

⁴ <https://www.jobsandskills.gov.au/data/occupation-shortage/occupation-shortage-list>

⁵ National Disability Services (2025) *NDS Workforce Census Report 2025*
<https://nds.org.au/insights/publications-and-reports/workforce-census-key-findings-report/>

⁶ Ibid.

Recommendation 2: Government should develop a clear plan to address workforce issues across the sector to ensure that support staff and allied health professionals are accessible to everyone who needs them.

Opportunity and disability pride

Disability pride recognises disability as an important aspect of human diversity and identity. A contemporary disability-inclusive Victoria should not only remove barriers to participation but also actively celebrate the contributions, leadership, creativity and lived experience of people with disability. True inclusion is not achieved solely through access to services and supports. It is achieved when people with disability are recognised as leaders, contributors, workers, students, artists, parents, and community members whose experiences enrich Victorian communities. Building disability pride and belonging should therefore be recognised as a core outcome of the State Disability Plan.

Overall, the government has made good progress in a number of areas associated with increasing the overall inclusivity of mainstream education settings, with increased training and professional development related to inclusive education. Victoria must continue its efforts to increase the overall inclusivity of mainstream settings to foster opportunity and disability pride.

For young children and their families, inclusion in mainstream settings is important for providing equal opportunities to all Victorians, and is an even more important focus for state government given the Thriving Kids reforms and changes to the NDIS. Thriving Kids will be important for thousands of young Victorians and their families. However, the budget for Thriving Kids is limited. Boosting inclusion in mainstream early years and educational settings is a critical investment which must be prioritised through the Plan, and should be considered as separate from (and in addition to) funding for Thriving Kids supports.

Victoria has higher levels of employment for people with disability than some other states. However, there is scope to improve further, including by building a more scaffolded transition from education into employment, particularly in relation to employment processes. This is in line with the National Disability Strategy 2021–31⁷ Policy Priority 2 in employment and financial security to ‘improve the transition of young people with disability from education to employment’.

Delivering employment services differently for young people with disability has the potential to change their employment trajectory and expand their employment aspirations.⁸ Employment support can be enhanced by bringing together employment services, schools, families, disability service providers, employers and local communities to generate opportunities for young people to shape employment goals, build confidence around employment and to create opportunities for

⁷ Department of Social Services (2024) *Australia’s Disability Strategy 2021-2031: 2024 update: building a more inclusive Australia* <https://www.ndis.gov.au/strategies/australias-disability-strategy-2021-2031> – page 14

⁸ Olney S, Gibney-Hughes S, Fawcett K & Demanuele A (2025) *Inclusive pathways to employment: policy levers to unlock the potential of young Australians with disability*, Brotherhood of St. Laurence, Fitzroy, Vic.

them to work.⁹ BSL's evaluation of the Inclusive Pathways to Employment¹⁰ pilot showed the potential impact of increasing pre-employment support for young people with disability that overlapped with schooling, rather than after it had been completed. The complex nature of post-school transitions to adulthood and employment made it difficult to quantify direct impacts on employment. However, benefits for participants included developing a clearer sense of control in their own life (69%), feeling more confident (87%), developing a clearer sense of what they were good at (86%) and working out what was important for them (92%). These are all important in the context of increasing aspirations of employment and supporting the broader transition into sustained and meaningful employment.

Recommendation 3: Governments should build inclusive mainstream settings to support Victorians with disability. Inclusive mainstream settings are a critical component of providing equal opportunities to Victorians with disability and should be appropriately funded in addition to the resources directed to Foundational Supports.

Recommendation 4: Government should deliver a more integrated transition from education to employment for young people with disability entering the labour market.

Systemic reforms

Systemic reforms need to be coherent, coordinated and transparent to ensure that gaps do not emerge in the system. Communication about systemic reforms needs to be delivered well ahead of time and transitions must be managed to ensure no one is lost in the gaps caused by changes in services and supports. Further to this, the Victorian Government should embed supported decision-making principles across disability, health, education and community services to ensure people with disability have the assistance they need to exercise their rights, express preferences and participate in decisions that affect their lives.

We welcome efforts made through the previous strategy to increase the integration of lived experience into how government consults and forms policy, however there is scope for further progress to be made. Meaningful consultation and policy co-design involves people with disability having the opportunity to not only have a voice in consultation processes, but to make decisions and be active participants in decision-making. In line with this, consultation processes can be further strengthened by linking lived experience more closely to decision-making.

The *State and Territory Disability Ministers Submission to the NDIS Amendment Bill 2026*¹¹ highlights significant risks posed by the federal reforms, including fragmentation and lack of coordination in service delivery for the disability service system outside the NDIS, as well as concerns about the pace

⁹ Ibid.

¹⁰ Pahor, T, Bond, S & Pilkinton, J (2025) *Inclusive Pathways to Employment pilot: final evaluation report*, Brotherhood of St. Laurence, Fitzroy, Vic

¹¹ State and Territory Disability Ministers (2026) *Submission to the Senate Standing Community Affairs Legislation Committee: National Disability Insurance Scheme Amendment (Securing the NDIS for Future Generations) Bill 2026*

of reform. The federal reforms include the creation of Thriving Kids, with the states and territories responsible for implementation. However, the process attached to the National Disability Insurance Scheme Amendment (Securing the NDIS for Future Generations) Bill 2026¹² has highlighted that the implementation roadmap for foundational supports remains unclear, despite looming changes to NDIS access. While accessible communication and universal design principles have been increased through the current Plan, as noted above, timeliness in communication is an important component of accessible communication. When the reforms are implemented, it will be important that service delivery is coordinated and that the State communicates clearly with the disability community about changes during this period.

Systemic reforms influence community inclusivity. Research from the Melbourne Disability Institute (MDI) and BSL in 2022 identified a significant gap between the promoted availability and accessibility of supports and services outside the NDIS, and the experience people had of accessing those services.¹³ Given this, it will be important for the next Plan to be clear about how the state will ensure people do not slip through the cracks as services transition from individualised funded supports in the NDIS into community-based supports. Furthermore, the state needs to ensure that appropriate services are accessible for all Victorians living with disability.

Already in use in the disability sector through roles like Local Area Coordinators, system navigation is a useful way to provide community outreach. Navigation supports should be designed to build individual capability, confidence and self-determination. Effective navigation is not only about helping people access services; it is also about supporting people with disability to understand options, exercise informed choice, advocate for their needs and make decisions that align with their goals and preferences.

Navigators should serve not only as a function that helps identify and access relevant supports; they can also support the capability building of people and organisations.¹⁴ A demonstration project undertaken by BSL on system navigators showed the potential they may have to build client capability and confidence to access support. While navigators may serve an outreach function and help build community capacity to navigate services, the BSL project and wider research on system navigators highlight navigation should not be used to avoid addressing unnecessary system complexity. For instance, navigators cannot replace thinking about how to better link and co-locate services when it is possible to do so. The BSL demonstration project showed that place-based and natural delivery settings are important to the success of navigators, as transport can be a significant barrier for many participants.

Time is important to successful navigation. Successful navigation requires building trust with clients and this takes time. The BSL project also identified that taking the time to map community services

¹² Parliament of Australia (2026) *National Disability Insurance Scheme Amendment (Securing the NDIS for Future Generations) Bill 2026*, Canberra.

¹³ Olney, S, Mills, A & Fallon, L (2022) *The Tier 2 tipping point: access to support for working-age Australians with disability without individual NDIS funding*, Melbourne Disability Institute, University of Melbourne.

¹⁴ Davidson, J (2019) 'Service navigation theory and practice', in Davidson, J, Hampson, R & Connolly, M (eds) *Service navigation: research and practice in health and human services*, Bloomsbury Publishing Plc.

and allowing navigator teams to build a deep understanding of the local context was important to the success of its pilot. This time allowed for navigators to identify appropriate services for clients, including sometimes hunting down very specialised services. Systemic reforms that utilise navigators to provide outreach and support will need to allow the necessary time for staff in those roles to develop trust and contextual understanding as a component of implementing changes. Rushing the implementation of such a service may create problems for developing relationships that are central to effective outreach and support, and result in problems in implementation.

Recommendation 5: Government should increase opportunities for people with disability to lead, influence and shape decision-making processes across government, community organisations, education, employment and civic life.

Recommendation 6: Where possible government must ensure enough time is given for changes to be properly communicated and implemented.

Recommendation 7: Government must dedicate resources to keeping people connected to supports and included in the community during the current transition period.