



**Carers Tasmania's Submission to the
NDIS Rules Consultation**

July 2025



About Carers Tasmania

Carers Tasmania is the Peak Body representing the more than 87,000 informal carers (hereafter carers) in the state.

Carers Tasmania's vision is for an Australia that values and supports carers.

Our mission is to work to improve the health, wellbeing, resilience and financial security of carers and to ensure that caring is a shared responsibility of family, community, and government.

Our values drive everything we think, say, and do.

- **Carers first** – we listen to what carers need, commit to their desired action plan, and deliver results that matter most to carers
- **Care in all we do** – we care for our work, about each other, about Tasmania's family and friend carers, and the bigger world we all share
- **Integrity always** – we are transparent, act ethically, own when things don't go to plan and do what we say we will
- **Quality every time** – we don't accept 'good enough' because carers deserve our very best every time
- **Speed that matters** – we are agile and don't put off what can be done today.

These values represent how we engage with and serve carers, how we work with each other, and our commitment to the broader community. Carers Tasmania encourages partnership with governments and health and community sectors to enhance service provision and improve conditions for family or friend carers through policy development, research and advocacy.

We acknowledge and support people of all genders, sexualities, cultural beliefs, and abilities and understand that carers in Tasmania, whilst sharing the common theme of caring for a family member or friend, are diverse individuals with varying beliefs, experiences, and identities. We value and respect the diversity of carers, their lived and living experiences, and recognise that carers are the experts in their own lives.

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1. Background

Carers Tasmania is the Peak Body representing the more than 87,000 informal carers within the state.

A carer is a person who provides unpaid care and support to a family member, or friend, with disability, mental ill health, a chronic or life-limiting condition, alcohol or other drug dependence, or who is frail or aged. Informal kinship carers who care for a child under the age of 18, because the parent is unable to, are also recognised as carers. Carers are predominantly family members, but may also be friends, neighbours, or colleagues. Informal carers are not to be confused with paid support workers who are often called 'carers', with the difference being that support workers are fully employed and remunerated with all the benefits of employment. On the contrary, informal carers perform their caring duties without remuneration, other than minimal carer payments and allowances from the Australian Government.

In addition to representing carers through the Peak Body activities, Carers Tasmania provides support to carers living in Tasmania through its service delivery arm, Care2Serve. The Australian Government Carer Gateway program is delivered through Care2Serve in Tasmania, as are other supports and services, such as the Tasmanian Government's Home and Community Care program.

Anyone may become a carer at any time. The likelihood of this occurring in Tasmania is high, with estimates showing that one in six people living in Tasmania is a carer. This proportion is higher than the national average. The Australian Bureau of Statistics Survey of Disability, Ageing and Carers (SDAC) revealed that there were 80,100 carers in Tasmania in 2018.¹ By 2022, this figure had increased to more than 87,000.²

The Carer Gateway program provides a range of free services and supports for carers which are designed to build resilience and knowledge, increase wellbeing, improve quality of life, and sustain carers to effectively continue their caring roles. The available supports include the provision of information, advice and referrals, holistic identification of carer strengths and needs through a carer support planning process, professional counselling, peer support, and coaching which aims to support carers in achieving specific goals.

Care2Serve, through the Carer Gateway, has capacity to fund certain instances of planned, practical support services such as in-home respite, personal care, domestic assistance, and meal preparation. Care2Serve may also fund items such as laptops to assist carers who are studying or trying to enter the workforce. Care2Serve also coordinates the provision of emergency support during instances where a carer may be unable to provide the care that they usually do, resulting from unexpected illness or injury of the carer.

¹ Australian Bureau of Statistics (2021). 44300DO006_2018 Disability, Ageing and Carers, Australia: Tasmania, 2018. Australian Bureau of Statistics. (abs.gov.au)

² Australian Bureau of Statistics. (2022). Disability, Ageing and Carers, Australia: Summary of Findings, 2022. Australian Bureau of Statistics (abs.gov.au)

2. Introduction

Carers Tasmania welcomes the opportunity to provide feedback towards the consultation about the NDIS Rules 2025.

To help ensure the financial security and longevity of the NDIS, enabling access to the supports required by people with disability, there must be clear guidance on what is and is not considered to be an NDIS support. However, it must be acknowledged that each person with disability has varying, individual needs and defining specific types of approved and not approved NDIS support without suitable explanation and some level of flexibility when required will not appropriately recognise and support this. These defined lists, although now a legislative requirement as per Section ten of the *NDIS Act 2013*,³ can also prohibit individual choice, control, and the rights of both people with disability and their carers.

Carers Tasmania provided a submission in August 2024 towards the consultation on the (then) Draft Lists of NDIS Supports. This current submission focuses on some of our previous feedback, feedback and changes that were noted in the '*Consultation on Draft Lists of NDIS Supports Full Report*'⁴ (hereafter referred to as the *Full Report*), and feedback that we continue to hear from Tasmanian carers.

Our response on the 'Draft Lists' consultation in 2024 included:

- Concerns about a lack of explicit support for building carer capacity.
- The impact of the rules on the pre-existing difficulty in accessing appropriate respite services.
- The need for clear inclusion of carer support within provisions, for example, enabling carers to undertake daily personal activities, develop life skills, undertake employment, training, and social activities.
- Certain items such as phones, tablets, and other accessories listed as ineligible supports should be considered when recommended by professionals to support a person with disability in accessing the community, communicating (when there are disability specific challenges), building independence, or assisting safety.
- Concerns about the potential exclusion of psychosocial supports and the impact on carers and people with psychosocial disabilities.
- Feedback that the mechanism for consultation lacked inclusivity and accessibility and required a more thorough and inclusive consultation.
- Emphasis of the need for specific supports to help carers maintain their roles.⁵

3. Broad feedback on the consultation

Many disability representative organisations (DRO's) have consistently advocated for a principles-based approach to determining appropriate NDIS supports, accompanied by clear guidance. Carers Tasmania supports the need for clear and explicit guidance, and strengthened definitions, around what constitutes an NDIS support, and particularly how an NDIS support may differ from what is deemed as a standard item for people without

³ Australian Government. (2013). National Disability Insurance Scheme Act 2013 (Cth) (No. 20 of 2013). Retrieved from <https://www.legislation.gov.au/C2013A00020/latest/text>

⁴ Department of Social Services. (2024, October). Consultation on draft lists of NDIS supports: Full consultation report. Australian Government. Retrieved July 22, 2025, from <https://engage.dss.gov.au/wp-content/uploads/2024/10/ndis-supports-full-consultation-report.pdf>

⁵ Carers Tasmania. (2024). [Carers-Tasmanias-Response-to-the-Draft-List-of-NDIS-Supports-.pdf](#)

disability. This approach and guidance are fundamental for people with disability and their carers. Whilst there must be clear rules, it is also essential that there is flexibility to ensure that when items are deemed to be 'standard items' for non-disabled people, but may serve a necessary, disability-related purpose, that they can be accessed by people with disability as required. What is deemed as a standard item for one person, may be an item that is genuinely required by a person with disability to support their daily living, connection, movement, capacity building, and independence. It also must be acknowledged that provision of these items will have great benefit to the person with disability, as well as their carers.

Some examples may include noise cancelling headphones, smart watches, or other electronic devices. In some areas of Australia, such devices may support a person to access online therapy appointments that may otherwise be inaccessible. For others who require assistance with daily communication due to their disability, items that can create visual aids (such as a printer and laminator) may be essential. This is an example of being able to tailor support in a timely and cost-effective way.

We reinforce feedback that was included in the *Full Report*,⁶ the recent *NDIS Consultation Webinar*,⁷ and from carers about their anxiety and confusion about potentially being told they are now doing the wrong thing in terms of supports, due to the introduction of these lists. This anxiety and inability to access some previously accessed supports leads to increased responsibility, pressure and stress on carers, or people with disability going without. The rules create confusion about what is reasonable and necessary, because what is reasonable and necessary for one person is deemed as a 'standard' task or item for another.

As previously noted, we are aware that Section 10 of the *NDIS Act 2013*⁸ specifies there must be lists declared within the rules. These rules must include clear definitions of what is meant by standard, as well as explanatory guidance on when that standard item which would be ordinarily not an NDIS support, may become an NDIS support due to a specific function or need for a person with disability. This should be supported if delivered as an approved form of therapy, modified, or used in for a disability-specific reason, and when recommended by an approved assessing professional.

Quote from Tasmanian carer:

"We went from one [plan manager] who we could access certain support and then when we moved, I had to pay back \$1000 due to the next plan manager not paying for that particular service that was previously approved. And therefore, no longer receive that support.

It's made requesting certain items much more difficult even with extensive reports which cost money and time. Most recently I had to advocate hard for my son to continue to be funded for AAC (augmentative alternative communication) device which is his only voice. It's a tremendous extra stress on families."

⁶ Department of Social Services. (2024, October). Consultation on draft lists of NDIS supports: Full consultation report. Australian Government. Retrieved July 22, 2025, from <https://engage.dss.gov.au/wp-content/uploads/2024/10/ndis-supports-full-consultation-report.pdf>

⁷ Department of Social Services. (2025, June). Webinar: NDIS Rule Development Webinar – 24 June 2025 [Video]. YouTube. <https://youtu.be/7m7UJclTHos>

⁸ Australian Government. (2013). National Disability Insurance Scheme Act 2013 (Cth) (No. 20 of 2013). Retrieved from <https://www.legislation.gov.au/C2013A00020/latest/text>

4. Feedback on the 'not an NDIS support' list

There are 15 categories of goods and services that are deemed as 'not NDIS supports.' As stated in our previous response, we strongly recommend these exclusions and their impacts are considered in terms of the United Nations Convention on the Rights of People with Disability (UNCRPD).⁹ Blanket exclusions are not appropriate. Instead, each item must be considered in terms of how it will support the person with disability, and where relevant, their carers.

An example of support that is listed as 'not an NDIS support' includes gaming therapy. Gaming therapy, when delivered by a professionally registered psychologist for the purpose of building social skill capacity, problem solving, learning to work with others, and through other peer therapeutic approaches could be considered an NDIS support. In some cases, a support such as this which may be engaging and exciting to some people, may reduce a reliance on carers when delivered by a professional. In addition, it could build independence of the person with disability, in terms of not relying on their carer to be their sole teacher, skills builder, and support provider.

Another example includes animal-assisted therapy or wilderness therapy when delivered by a qualified and registered therapist. While both are listed on the 'not an NDIS support' list, a person with disability may still wish to engage in these activities privately and require assistance from a support worker to do so. However, because these therapies appear on the 'not an NDIS support' list, some providers and support workers may believe they are not permitted to assist a person even to attend this form of activity. This means that for a person with disability to attend, their carer may need to take them, potentially causing challenges for them. Greater clarity is needed to ensure that support workers are confident in assisting individuals to access such activities as part of their social participation. Consideration should also be taken on funding these supports when delivered by a qualified and suitably registered therapist.

In terms of travel and transport, *"transport for children as part of their reasonable care and support provided by families or carers"* is listed as 'not an NDIS support. Carers repeatedly inform Carers Tasmania that supports are often declined due to being deemed as 'normal parental responsibility.' Better clarification and guidance must be provided on this, taking into account the diverse range of experiences of children and young people with disability and their carers. What is deemed as a 'reasonable parental duty' for one person, may not be for another. For example, many people may be able to have their teenager catch a school bus, or walk to school independently, but for some teenagers with disability, this may not be appropriate. In situations such as this, there must be clear guidance on how to determine whether this support is a reasonable parental expectation, or something that could be supported by the NDIS, and in doing so, may also support the young person with their independence and confidence. When carers are constantly relied on for most aspects of care, their own health, wellbeing, employment and financial circumstances are challenged. This also places greater disadvantage and strain on the whole family, which may not only impact in the short term, but also well into the future.

Wellness and coaching related supports are stated on the 'not an NDIS support' list. Whilst some of the supports provided through wellness and coaching related fields may not be evidence based, and unregulated in terms of registration, it is important to consider that for some, coaching is a valuable tool to assist with planning and achieving goals. A huge

⁹ United Nations. (2006). Convention on the Rights of Persons with Disabilities.
<https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-persons-disabilities>

concern articulated by carers, is the lack of proactive support provided through NDIS services to help people with disability plan for their futures. Many carers are worried about what will happen to the person they support when they pass away or are no longer able to provide care. Carers Tasmania has heard of ongoing concerns that support workers do not support this future planning and goal setting.¹⁰

Quote from Tasmanian carer:

*"I love my son unconditionally even with all his little quirks, I worry every day of what will happen to him when I fall off the perch, who will care for him as I have done over the years without selfishness."*¹¹

In terms of other 'wellness and therapy' options, the list could be amended so that it's not restrictive on the form of wellness or therapy but instead sets guidelines or could outline the types of suitably qualified and registered therapist or allied health professionals who can deliver these therapies for disability related purposes. This could apply for therapies deemed as alternative or complementary (e.g. sound, yoga, wilderness, animal, or neurofeedback therapy) if delivered by an approved and registered professional.

As previously noted, there are assistive technology items that are now deemed 'not an NDIS support', that could in fact provide great assistance to people with disability and their carers. We urge the consideration of these items on a disability specific basis, especially when specifically recommended by an appropriate therapist.

Better clarification is required about the meaning of 'standard' when referring to:

- Standard home repairs, home improvements, standard renovations and maintenance.
- Standard household (including garden) items, appliances, tools and products. For example, a dishwasher, fridge, washing machine, non-modified kitchen utensils and crockery, food processors, electric toothbrushes, floor rugs, beanbags, standard mattresses, and bedding.
- Standard furniture, fixtures or fittings. For example, lounges, beds, fire alarms, blinds.

Clear guidance must be provided on what is considered 'standard' in which circumstances, especially if some of these items are to support a disability specific need and recommended by an appropriate therapist.

Our feedback at this stage of consultation remains the same as our feedback in 2024¹² regarding non-NDIS eligible education-related items such as:

- Personalised learning or supports for students that primarily relate to their educational attainment,
- Aids and equipment for educational purposes (e.g. modified computer hardware, education software, braille textbooks),
- Textbooks and teaching aids (including alternative formats),
- Tutors, scribes,

¹⁰ Carers Tasmania. (2023). Submission to the NDIS Review. [Carers-Tasmania-submission-to-the-22-23-NDIS-Review-2.pdf](#)

¹¹ Carers Tasmania. (2023). National Carer Survey Tasmanian Report. [2022-National-Carer-Survey-Tasmanian-Report.pdf](#)

¹² Carers Tasmania. (2024). [Carers-Tasmanias-Response-to-the-Draft-List-of-NDIS-Supports-.pdf](#)

- Educational supports associated with home schooling, and
- School refusal programs.

Whilst we acknowledge that state and territory education departments are responsible for providing reasonable adjustments to support students with disability to participate effectively and safely in education, many schools are under-resourced and the processes to obtain additional funding for schools can be time consuming, confusing and stressful. The types of additional supports provided within schools differs greatly across Australia and often requires significant advocacy from carers.

Limited supports within school settings increases pressure on carers, in terms of out-of-pocket expenses, needing to regularly pick up children from school early, and difficulties getting their child to attend school. This causes stress, isolation, challenges with employment and income, and financial insecurity. It also influences attendance rates for children with disability, highlighting that the Australian Institute of Health and Welfare, states that *“people with disability generally have lower educational attainment than people without disability.”*¹³

5. Feedback on the ‘is an NDIS support’ list

The ‘is an NDIS support’ list consists of 37 categories. Ongoing feedback from carers indicates difficulties for people with disability and their carers to map their needs within NDIS categories and funding buckets.

Whilst there have been some welcome additions to the ‘is an NDIS support’ list, following the 2024 consultation, gaps remain in terms of supports that should be considered.

In our response to the 2024 consultation, we highlighted that there was no specific mention of carers, especially within the categories such as:

- Assistance in coordinating or managing Life Stages, Transitions and Supports,
- Assistance With Daily Life Tasks in a Group or Shared Living Arrangement,
- Daily Personal Activities, and
- Household tasks.¹⁴

Within these support areas, we seek for carers to be clearly defined, and reference to where some of these supports may assist carers. In addition, respite opportunities for carers must be explicitly listed as a support, so there is no doubt about including relevant supports for carers when required. Respite can be facilitated while the person with disability undertakes many of the listed activities, provided that adequate time and support is allocated. This need was also discussed in the recent *Consultation Webinar*¹⁵ and *Full Report*¹⁶

In our 2024 submission, we recommended that support for household tasks should consider the additional support often required due to physical or psychosocial disability, rather than relying solely on whether such tasks are identified as explicit goals within a participant’s

¹³ Australian Institute of Health and Welfare. (2024). People with disability in Australia, Summary. [People with disability in Australia, Summary - Australian Institute of Health and Welfare \(aihw.gov.au\)](https://www.aihw.gov.au/reports/disability/people-with-disability-in-australia)

¹⁴ Carers Tasmania. (2024). [Carers-Tasmanias-Response-to-the-Draft-List-of-NDIS-Supports-.pdf](#)

¹⁵ Department of Social Services. (2025, June). Webinar: NDIS Rule Development Webinar – 24 June 2025 [Video]. YouTube. <https://youtu.be/7m7UJclTHos>

¹⁶ Department of Social Services. (2024, October). Consultation on draft lists of NDIS supports: Full consultation report. Australian Government. Retrieved July 22, 2025, from <https://engage.dss.gov.au/wp-content/uploads/2024/10/ndis-supports-full-consultation-report.pdf>

plan. We frequently hear from carers who report that, even when the person they support is unable to fully or partially engage in household tasks, funding is often denied if the task is not a personal goal, despite it being a reasonable expectation for a person without disability to undertake. As a result, carers are often left with a disproportionate share of domestic responsibilities. This issue similarly affects parents of children with disability, with these additional responsibilities frequently dismissed as 'normal parental duties.'

Quote from Tasmanian carer:

“My 10yo daughter is incontinent, dribbles, is clumsy with eating due to control and concentration and leaves plenty of mess. She would also constantly draw on walls, tip water, and empty out contents of pantry and bathroom cupboards. I am cleaning and scrubbing daily (and have 3 other children to care for), but my request for a few hours of help weekly has been denied.”¹⁷

Carers Tasmania also acknowledges that the need to reference and include respite for carers was discussed in the *Consultation Webinar*¹⁸ and the *Full Report*.¹⁹ More specifically, it was highlighted how the inability to access respite services exacerbates the challenges experienced by carers and may disable the family unit from being able to support a person with disability to realise their potential. There were some improvements, particularly in areas such as specialist positive behaviour support, where carers have now been included in the list.

6. Additional feedback

Although not a core focus of this consultation, we wish to highlight concerns around other NDIS changes and functions including:

- NDIS Pricing Arrangements and Price Limits,²⁰
- NDIS plan funding period changes, and
- Regular feedback from carers of people with disability who have inadequate plan funding for both necessary ongoing support, as well as coverage for emergency circumstances.

We seek careful consideration of how any future changes to NDIS rules, functions, and funding broadly and on an individual basis, will impact people with disability and their carers.

¹⁷ Carers Tasmania. (2023). Carers Tasmania's Submission to the NDIS Review. [Carers-Tasmania-submission-to-the-22-23-NDIS-Review-2.pdf \(carerstas.org\)](#)

¹⁸ Department of Social Services. (2025, June). Webinar: NDIS Rule Development Webinar – 24 June 2025 [Video]. YouTube. <https://youtu.be/7m7UJclTHos>

¹⁹ Department of Social Services. (2024, October). Consultation on draft lists of NDIS supports: Full consultation report. Australian Government. Retrieved July 22, 2025, from <https://engage.dss.gov.au/wp-content/uploads/2024/10/ndis-supports-full-consultation-report.pdf>

²⁰ Carers Tasmania. (2025). [Carers-Tasmanias-Feedback-on-the-NDIS-Pricing-Arrangements-and-Price-Limits-2025-2026-1.pdf](#)

7. Conclusion

Carers Tasmania thanks the Australian Government for the opportunity to respond to this stage of NDIS reforms. The NDIS supports many people across Australia with disability and their carers. We acknowledge the important work of the Australian Government and NDIA to improve experiences of the NDIS. However, Carers Tasmania believes that more thorough and inclusive consultation is required across all further aspects of the NDIS reforms to support ongoing confidence and trust in the NDIS, and to ensure that people can access the supports that they require, when they need to.

As previously stated, we encourage comprehensive consultation on any changes to NDIS rules and functions, ineligible and eligible supports. This includes with the sector, people with disability and their carers. Any decisions for change must uphold the principles of the UNCRPD for people with disability, and the rights of carers, as per state, territory and Commonwealth legislation, as well as the Universal Declaration of Human Rights.²¹

Lastly, we reinforce the critical need to ensure that there are specific and ongoing support types available to carers to assist them in maintaining their caring roles, and that whenever planning for people with disability occurs within the NDIS, that carers are recognised, included, and supported, to support the whole family unit.

²¹ United Nations. (1948). Universal Declaration of Human Rights. <https://www.ohchr.org/en/human-rights/universal-declaration/translations/english>