COTA
For older Australians

2026–27 Federal Budget
Pre-Budget submission

Prepared by

COTA Australia

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About COTA Australia

COTA Australia is the leading national peak body supporting and advocating for older Australians since 1958. COTA (Council on the Ageing) Australia promotes the rights interests and good futures of older Australians over 50.

Our broad agenda is focussed on challenging ageism, respecting diversity, and empowering people to live their best life as we age.

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Introduction

Australia is at a pivotal moment in its demographic trajectory. An ageing population is often framed as a looming fiscal challenge, yet this narrative fundamentally misunderstands the opportunity of longevity. Australians are living longer because of decades of investment in public health, medical innovation, and social progress. This is a success story. The policy challenge is not ageing itself, but ensuring our systems, institutions, and economic settings are fit for purpose in a society where later life is longer, more diverse, and more complex than ever before.

COTA Australia's State of the Older Nation 2025 (SOTON25) report is available at cota.org.au/soton25. It is a survey of older people living in Australia aged between 50 and 99 years old. Its insights demonstrate that while 76% of older Australians rate their quality of life as 7-10, nearly 1 in 2 (48%) say things are getting worse for people overall[1].

Too often, older Australians are reduced to simplistic and opposing stereotypes: either portrayed as uniformly wealthy and insulated from economic pressure, or as frail, dependent, and a burden on public finances.

These simplistic and inaccurate stereotypes obscure the lived reality of millions of people whose later lives are shaped by cumulative advantage or disadvantage across their life course. Housing insecurity, gender inequality, caring responsibilities, age discrimination, digital exclusion, and inadequate access to services all converge in later life, frequently with sudden and severe consequences.

SOTON25 shows us that the "rich boomer" stereotype doesn't hold, with 25% of older Australians in poverty, 28% are wealthy, and 47% are neither – a split that underscores large intra-generational differences.[2] 36% have < $100k in combined savings and investments, including 15% who have < $5k which is evidence of the limited buffers that many older people have.[3]

These stereotypes persist not because they are accurate, but because they are convenient.

They ignore the community and economic contribution of older people; simplify complex policy challenges; and allow us to avoid uncomfortable conversations about inequality and disadvantage.

The 2026–27 Federal Budget presents a critical opportunity to reset how Government responds to ageing. A coordinated, whole of government approach that recognises the diversity of later life experiences and prioritises prevention over crisis response is required. One which will ensure that people can age with dignity, security, and choice. This includes addressing structural barriers that limit economic participation, access to credit, essential

[1] COTA Australia, State of the Older Nation 2025 – Summary Report. Available at cota.org.au/SOTON25

[2] Ibid

[3] ibid

services, and health supports, while also confronting the persistent ageism that undermines policy design and service delivery.

COTA Australia's pre-budget submission outlines a set of practical recommendations that reflect this ambition. By acting decisively in this Budget, the Australian Government can shift the narrative from managing ageing to planning for longevity. A society that prepares well for later life is not only fairer for older people – it is more resilient, productive and inclusive for all generations.

Summary of Recommendations

Recommendation 1: Create a 10 year plan for an ageing Australia

Create a ten-year whole of government plan for an ageing Australia, that:

- identifies measurable actions for government, business and civil society, with transparent accountability for delivery, tracked over time;
- utilises an intersectional gender lens in the design, implementation and evaluation of actions, recognising the impacts of compounding discrimination (e.g. age, race, disability, socio-economic status and geographic location) over the life course
- is co-designed with people 50 years and over, including older people who may be vulnerable and older people from diverse backgrounds;
- outlines initiatives in age discrimination, elder abuse, housing/homelessness, retirement incomes (including financial services), promote age diverse workforces, aged care, health (including healthy ageing) and digital confidence/participation;
- incorporates a national research program to properly map the presence and impact of ageist laws, policies and practices that still exist;
- outlines steps to tackle ageism, including:
    - a focus on prevention to address ageism early,
    - quantifying the prevalence and cost of ageism,
    - funding anti-ageism actions proven to work, and
    - raising public awareness on how to end ageism and age discrimination across the community.
- establishes a national 'Mid-Life Check' (modelled on the UK's Mid-life MOT) to provide Australians aged 45–60 with integrated, proactive planning support across employment, financial security, and health to ensure career longevity and retirement readiness;
- enhances economic participation of older people, and confronts inequalities that prevent a dignified retirement; and
- Increases training opportunities for mature age employees to access industry-recognised qualifications, including wraparound supports to access the best career-ready training, and increase availability of micro-credentials in digital skills such as artificial intelligence and cyber safety.

Recommendation 2: Annual $750 superannuation contribution on the Carer's Payment for eligible recipients

Recommendation 3: Develop a policy with the objective of introducing a "retiree credit assessment standard" to ensure that people no longer working receive equitable credit assessment outcomes as those who are working. Implementation, including consultation, would be undertaken by ASIC and APRA.

This reform will modernise Australia's regulatory framework to ensure credit parity for non-working Australians and unlock economic participation by:

- **Integrating alternative assessment metrics:** Requiring the formal recognition of long-term repayment history,
- **Bridging the Asset-Income Gap:** Establish formal protocols that allow lenders to prioritise substantial net-asset positions over recurring income for low-risk applicants,
- **Standardizing Superannuation Income:** Eliminate administrative friction for retirees by mandating a consistent industry-wide 'Superannuation Income Certificate' to verify SMSF and pension drawdowns as stable, qualifying income, and
- **Decouple Loan Terms from Working Age:** Reform regulations to permit 'lifecycle lending' strategies, including estate-based repayment and loan tenures based on modern actuarial life expectancy rather than traditional working-age caps.

Recommendation 4: Ensure that banks facilitate supports for older Australians to increase their digital confidence in banking and retain access to essential banking services during and post the payment systems reforms.

Building digital confidence should include regulation that ensure:

- **A "Poverty Premium" Prohibition:** Regulation to prevent the application of surcharges on cash transactions, ensuring those who rely on non-digital currency are not financially penalized.
- **Guaranteed Service Standards:** Access to essential non-digital banking channels (such as telephone banking and over-the-counter services) remains a guaranteed, surcharge-free service standard for those unable to transition.
- **Mandatory Community Impact Assessments:** Banks must conduct comprehensive assessments prior to any physical service withdrawal. These assessments under the Banking Code of Practice and the ABA's Branch closure support protocol, must go beyond considering just geographic proximity of other services, to evaluate the individual digital readiness and specific needs of the local customers, including older digitally unconfident customers.
- **Measurable Digital Confidence Outcomes:** Digital literacy support is treated as a core service obligation, utilising nationally consistent, co-designed training programs delivered through trusted community channels rather than just bank-led digital marketing.

Recommendation 5: Announce clear transition plan to implement the Government's commitment of a single home and community-based program, in which no participant waits more than 30/90 days from application to service commencement, milestones should include:

- Immediately, transfer the service type of personal care, at least for showering, to the 0% co-contributions clinical care service category.
- No later than 1 July 2026, implement price caps on Support at Home unit prices, and actively monitor unreasonable prices until they are introduced.
- No later than 1 July 2027, older Australian can direct Government to directly fund multiple registered providers to support them.
- From 1 July 2027, outline clear six-monthly phases towards the single support at home program (announced in the May 2026 budget).

Recommendation 6: Introduce a Senior Dental Benefit Scheme with a focus on preventive oral health care to ensure aged pensioners, and older people receiving aged care services have timely locally - accessible and affordable services that enhance their oral wellbeing.

Prime Minister and Cabinet

1. A 10 year plan for an ageing Australia

Australia's ageing population is frequently framed as a fiscal challenge. The real issue is the limited and misleading ways older Australians are portrayed – either as wealthy and asset rich or as frail and financially burdensome. In reality, an ageing population is a remarkable tribute to modern science, medicine, and public health. Living longer is something to celebrate.

Over half 54% of older people report in SOTON25 that government policies don't meet their age cohort's needs[4]. For many older people Ageism is widespread with 38% reporting they have experienced ageism since turning 50, including 27% who encountered it in employment settings, and 19% in service settings (such as government services)[5]. A clear focus on tackling ageism in employment remains with 57% of older workers reporting to SOTON that they suspected their employer preferred someone younger, 31% were told they were overqualified, 22% were refused employment and 21% report they were sidelined[6]. SOTON's inclusion of the World Health Organisation's Ageism Scale (short form)[7] provide a baseline for tracking, with the average ageism score of all people over 50 at 2.5[8] (higher among those who experienced ageism).

Separately, COTA conducted quantitative and qualitative research of its supporters on the issues that affect them, using a gender lens.[9] Over 1600 respondents over 50 years were received across 70% women and 30% men, with ages ranging from 51 to 101. Collectively, they were also concerned about access to affordable housing and health care (including mental and dental health services) as they aged, the impacts of ageism and discrimination, and climate change, with different primary concerns by age group and gender.[10] SOTON25 inform us that just over half (54%) of Australians 50+ believe that "government policies do not meet the needs of people their age".[11] These findings support what we hear in our ongoing engagement and research with older people, and reinforce the need for action plans to recognise the diversity of people aged 50 and over.

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[4] COTA Australia, State of the Older Nation 2025 – Summary Report. Available at cota.org.au/SOTON25

[5] Ibid

[6] Ibid

[7] For more information visit the WHO Ageism Scale: aworld4allages.org/who-ageism-scale

[8] COTA Australia, State of the Older Nation 2025 – Summary Report. Available at cota.org.au/SOTON25

[9] COTA Australia, Ageing affects us all: Equality, Age and Gender in Australia, survey conducted in 2025. Report forthcoming.

[10] Ibid

[11] COTA Australia, State of the Older Nation 2025 – Summary Report. Available at cota.org.au/SOTON25

A 10-year whole-of-government plan is essential to:

- **Confront Inequality:** A "one-size-fits-all" approach fails to account for the cumulative disadvantage of diverse groups. We need policy design that recognises that while we are all ageing, we are not all ageing equally. We need a plan that recognizes that a dignified retirement looks different for someone in a regional town, with no public transport, versus someone in a major city. Policy responses must reflect differences in gender, geography, health, culture, sexual orientation, disability, and socio-economic background.
- **Capitalising on Mature-Age Expertise:** Investing in skills, training and workforce participation for people over 50 reframes older Australians as contributors not budget costs. It also means the country would use the vast, untapped resource of experience and mentorship.
- **Ensure Career Longevity and Retirement Readiness:** Providing Australians aged 45–60 with integrated, proactive support across employment, financial security, and health can help bridge the gap between mid-life employment and long-term financial security. Model it on the UK's Midlife MOT.[12]
- **Prioritise Prevention:** Early intervention and prevention – particularly tackling workplace ageism will reduce system-wide pressure on health systems, aged care, and income support. It will also By tackling workplace discrimination at 50, we prevent the "forced retirement" that leads to poverty at 70.[13]
- **Embed Intra and Inter-generational Equity in Age-Friendly Policies:** Ensure a whole-of-government approach to policy and program development that incorporates and values citizen contributions regardless of age. By addressing the specific structural barriers faced by both older and younger generations, the Government will move beyond age-silos toward a more cohesive and resilient national economy.
- **Targeted responses and funded interventions** are needed for a range older populations, including vulnerable and poorly served groups:
    - **First Nations Elders:** Who face significant barriers to culturally safe aged care and often experience the onset of age-related health conditions earlier due to lifelong systemic disadvantage.[14]

[12] Department for Work and Pensions (UK), 'Midlife MOT: Your work, health and money' (Web Page, July 2023) https://jobhelp.campaign.gov.uk/midlifemot/.

[13] Australian Human Rights Commission, *Willing to Work: National Inquiry into Employment Discrimination Against Older Australians and Australians with Disability* (Report, 2016) 11.

[14] Royal Commission into Aged Care Quality and Safety, *Final Report: Care, Dignity and Respect* (Volume 3B, 2021) 505–510.

- **Older Renters:** Older Australians in the "missing middle" who do not own their homes are increasingly exposed to immediate housing precarity due to the lack of long-term tenure and rising costs in the private rental market.[15]
- **Older people experiencing housing insecurity:** Older women remain the fastest growing group at risk of homelessness and need specific support and programs to address. Older men, continue to be over-represented among those sleeping rough or in improvised dwellings, often following transition from institutional settings or due to a lack of social support networks.[16]
- **LGBTI+ older people:** Many of whom "go back into the closet" when entering aged care due to fears of discrimination or a lack of inclusive service providers.[17]
- **CALD older people:** Who face language barriers on top of "digital exclusion," compounding the challenges to navigate modern systems like My Aged Care.[18]
- **Older Women:** A lifetime of structural disadvantages – including the gender pay gap[19], lower superannuation[20], and the "unpaid care penalty" – culminates in later life, leaving some older women with significantly fewer assets to achieve a dignified retirement[21]

A dedicated Office for Ageing, supporting the Minister for Ageing and Minister for Seniors, should lead the development and delivery of the 10 year plan.

By investing in this roadmap now, we can build a fairer, more inclusive and economically resilient society for all generations.

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[15] Swinburne University and HAAG, *Older Australians living in private rentals disproportionately exposed to housing precarity* (Report, 2025) 8.

[16] Australian Institute of Health and Welfare, *Specialist Homelessness Services Annual Report 2024–25* (Report, 2025) 34.

[17] Royal Commission into Aged Care Quality and Safety, *Final Report: Care, Dignity and Respect* (Volume 3B, 2021) 481.

[18] Federation of Ethnic Communities' Councils of Australia (FECCA), *2020 Review of the National Ageing and Aged Care Strategy for CALD People* (2020).

[19] Workplace Gender Equality Agency (WGEA), *Ages and Wages: The Gender Wealth Gap* (Report, 2025) 12.

[20] Super Members Council (SMC), *Economic Security in Retirement: How life events affect older Australian women* (Report, October 2025) 8.

[21] Workplace Gender Equality Agency (WGEA), *The Gender Wealth Gap: Cumulative Disadvantage for Older Australians* (Report, 2025) 14.

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2. Improving Economic Security for Older Women

COTA Australia welcomes the Government's *Working for Women Strategy* as a vital step toward strengthening women's economic security.

To ensure this strategy effectively protects those most at risk, we must address the current "visibility gap" in national data.

SOTON25 highlights persistent disparities between older women and men, including that men 50+ are more likely to be in the workforce (47% vs 39% women) and men 67+ are almost twice as likely to still be working (19% vs 10% women).[22] Women are more likely to feel left behind by technology and to say it's too hard to keep up (and 74% of women think tech needs better design for older people).[23] Women are more likely to have been unable to access needed health services in the last year (21% vs 15% men) and are more likely to report feeling lonely (49% vs 44% men).[24]

This demonstrates the need for national research to be disaggregated by life stage, including the different life stages faced by the 50+ cohort. This would show the impact of specific economic "shocks" – such as divorce, illness of a partner or menopause related health impacts – which can quickly compound a lifetime of inequality into sudden poverty. Research must better capture the diverse experiences of First Nations peoples, CALD people, and regional women, to replace stereotypes with an evidence base that supports targeted, preventative action. Ensuring that research captures the experiences of all women aged 50 and over, is a minimum obligation of a gender equity strategy.

The Strategy's priority area 3 focuses on 'economic equality and security' and acknowledges the gender gaps driven by patterns of work and care, including commitments for future efforts to examine the impact of care on superannuation and income supports.

This is particularly important for older women and the triple penalty they face of

- **The gender pay gap and lower retirement income (superannuation) balances**: While the gender pay gap is gradually closing (21.1% for private sector employees[25]), structural inequity across the life course remains. Women continue to retire with superannuation balance 25% lower than men,[26] leaving them with significantly less financial security despite a longer average life expectancy. Not receiving

[22] COTA Australia, State of the Older Nation 2025 – Summary Report. Available at cota.org.au/SOTON25

[23] Ibid

[24] Ibid

[25] Workplace Gender Equality Agency (WGEA), *Australia's Gender Equality Scorecard 2024-25* (Report, 27 November 2025)

[26] Super Members Council (SMC), *Mind the Gap: How unpaid super is deepening retirement inequality for women* (Report, August 2025)

superannuation while fulfilling unpaid care responsibilities can compound the existing retirement income gap.

- **The Private Savings Erosion:** Caring responsibilities often require reducing work hours or leaving the workforce altogether. This significantly diminishes private savings and compound interest precisely when they are most needed to secure a dignified retirement.[27]
- **Systemic ageism in recruitment and retention**: With 24% of HR professionals classifying workers as "older" by age 51, ageism is a significant contributor to permanent workforce exit, particularly when combined with a lack of flexible work arrangements needed to balance late-life caring responsibilities.[28]

Building a robust evidence base on how caring responsibilities and other factors affect employment, retirement outcomes, and the economic security of women over 50 is critical. This includes how women with caring responsibilities can better maintain a retirement income level during these periods out of the workforce. Evidence, and greater public reporting, will allow longer term solutions to be explored and implemented. However, immediate assistance is required to improve retirement incomes for older women who are already in the 'sandwich' caring period of their 50's and 60's.

While not all carers are eligible for the Carers Payment, COTA Australia supports the National Women's Alliances' call:

- For an annual $750 superannuation contribution on the Carer's Payment for eligible recipients (who receive no other earnings); and
- To evaluate the mechanism after three years to determine its impact on the retirement balance of carers and the superannuation gender gap.

Recommendation 2: Annual $750 superannuation contribution on the Carer's Payment for eligible recipients

[27] Carers Australia, *Caring Costs Us: The economic impact on lifetime income and retirement savings of informal carers* (Report, 2022)

[28] Australian Human Rights Commission (AHRC) and Australian HR Institute (AHRI), *Employer biases against older and younger generations* (Report, July 2025); and ARC Centre of Excellence in Population Ageing Research (CEPAR), *New report highlights challenges for mature workers in Australia* (Report, December 2025).

Treasury

3. Ensure Government regulation isn't a barrier to applying for credit in later life

The transition to retirement in Australia has undergone a structural shift. The proportion of homeowners over 55 with a mortgage has increased six-fold (from 7% in 1996 to 24% in 2020) with average balances doubling.[29] Government has identified the need for more income stream products in retirement that will support the dignified retirement[30] of older Australians to assist them to utilise more of their retirement savings.

Unfortunately, the effectiveness of these income strategies is currently undermined by a significant gap in the credit market. For many older Australians, access to credit is restricted due to lending frameworks that do not reflect longer lives, modern retirement patterns, or differences from other borrowers such as a shorter lifespan/repayment future, non-traditional income sources (e.g. superannuation, shares or rent) and the recognition of asset-based wealth as a valid component of responsible lending assessments.

Despite 23% of older people holding >$500k in savings/investments,[31] one reason they are routinely denied credit is because they lack PAYE income. Standard bank assessments seem to misinterpret ASIC and APRA responsible lending rules as requiring a traditional salary, even though only 36% of people aged over 50 primarily rely on wages, while 34% rely on the Age Pension and 22% on super/retirement income[32]. Older Australians should be able to access credit, in the same way as other age cohorts, to help them manage unexpected expenses and bill shock. This facility would help retirees to confidently spend their income rather than preserving capital for a 'rainy day.'

As the post-work lifespan of Australians increases, the Government must ensure regulations do not prevent banks from developing appropriate products tailored to this expanding demographic, particularly those with complex retirement portfolios and wealthy asset levels.

However current lending settings are outdated and fail to recognise stable retirement income sources like Account-based pensions (ABP) and SMSFs[33], and inappropriately discount age pension income in the same way they might other less stable Centrelink payments.

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[29] ABS *(1997-2022). Housing Occupancy and Costs – Housing Occupancy.; Ong, R. et. al. (2019, August). Mortgage stress and precarious home ownership: implications for older Australians. AHURI.*

[30] A dignified retirement is one where a person has sufficient income, alongside government supports, to maintain their pre-retirement lifestyle, participate economically and socially in their community, and sustain reserve funds for unforeseen costs and long-term financial security.

[31] COTA Australia, State of the Older Nation 2025 – Summary Report. Available at cota.org.au/SOTON25

[32] Ibid

[33] *Money Magazine*, "The challenge of getting a credit card in retirement" (July 2025).

Lenders also commonly require people over 50 to repay loans before they cease full time work or where loaning to retiree's require that credit is repaid in full before an actuarial assumed date of death. These rules compress loan terms into unaffordable timeframes, even when applicants have substantial equity. This disproportionally affects older women who have assets but can't secure bridging finance after divorce or a caring related early retirement or older people needing home modification or disability related upgrades.

In addition, specific responsible lending obligations around the assessment of credit cards require lenders to assess a person's ability to repay the credit limit within 3 years. Current practice of only assessing income often result in either credit applications by retirees being reject outright, or inappropriately low credit limits being imposed.

In addition, by ignoring the fact that a loan can be effectively secured against equity and settled upon the eventual sale of an asset or the finalization of an estate, current lending frameworks do not account for the modern longevity profile, resulting in a systemic failure to recognize the sustained financial capacity of older Australians.

Together these regulatory and commercial practices contribute to systemic age discrimination in credit assessments. Access to credit is not a solution for all retirees – a balanced approach is needed – one that protects vulnerable older people while providing appropriate credit access for those with assets and income to support lending.

As the average age increases and people live longer, ensuring a balanced approach to appropriate credit access for those who can be responsibly loaned to, while maintaining appropriate credit protections for those who should not be granted credit is required.

Recommendation 3:

Develop a policy with the objective of introducing a "retiree credit assessment standard" to ensure that people no longer working receive equitable credit assessment outcomes as those who are working. Implementation, including consultation, would be undertaken by ASIC and APRA.

This reform will modernise Australia's regulatory framework to ensure credit parity for non-working Australians and unlock economic participation by:

- **Integrating alternative assessment metrics:** Requiring the formal recognition of long-term repayment history,
- **Bridging the Asset-Income Gap:** Establish formal protocols that allow lenders to prioritise substantial net-asset positions over recurring income for low-risk applicants,
- **Standardizing Superannuation Income:** Eliminate administrative friction for retirees by mandating a consistent industry-wide 'Superannuation Income Certificate' to verify SMSF and pension drawdowns as stable, qualifying income, and
- **Decouple Loan Terms from Working Age:** Reform regulations to permit 'lifecycle lending' strategies, including estate-based repayment and loan tenures based on modern actuarial life expectancy rather than traditional working-age caps.

4. Build digital confidence in banking as part of payment system reforms

Australia's payment system reform, outlined in *A Strategic Plan for Australia's Payments System,* aims to create a modern, digital-first economy. Without careful implementation, and a focus on the plan's pillar of 'Accessibility', the reforms risk financially excluding those older Australians who lack digital confidence or are unable to use or access it.

We welcomed the Government's success in securing a moratorium on regional branch closures last year, but its scheduled expiry in July 2027 is a concern. This date sits alongside other significant planned changes including the simultaneous rollout of cash acceptance mandates and surcharge bans (2026), the removal of non-digital solutions like cheques (2028), and the cessation of the Bulk Electronic Clearing System (BECS) (2030) which may impact current practices such as telephone banking BPay services.

There will always be a need for non-digital alternatives including for a those who are not digitally confident, or who may never transition to digital or who re-enter a digitally unconfident cohort due to cognitive impairment. Where it is necessary to close a local branch, the digital confidence and digital ability of local customers is a necessary consideration to ensure that the loss of local branches does not become a driver of financial exclusion. Industry self-regulation, such as the Banking Code of Practice by the Australian Banking Association and Community Owned Banking Association's, along with the ABA's Branch Closure Protocol should be considered when determining how to achieve a commitment to non-digital alternatives and customer impact assessments.

The urgency of this safeguard is highlighted by the State of the Older Nation 2025 data, which shows that 14%[34] of Australians over 50 years – approximately 1.2 million people – are not confident with digital services like online banking.[35] For these individuals, the "modernisation" of the payments system is like an eviction from it.

Digital banking architectures frequently lack the specialised oversight required for high-risk fiduciary accounts (e.g. multiple signatories, checking identification, identifying out of character transactions). Without the human-in-the-loop verification services of a branch, executors and community volunteers such as owners corporation committee members, are left without adequate safeguards against digital fraud and complex compliance errors, shifting an unreasonable level of risk and liability onto volunteers.

The payment systems reforms represent a pivotal shift in how we manage our wealth, yet for a significant portion of the population, this shift threatens to move essential financial services out of reach. Reforms must prioritise digital confidence building not simply digital migration as well as keeping non-digital options for those who can't migrate.

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[34] SOTON25 was conducted online and therefore the digitally unconfident figure, including those not able to participate online, is likely higher.

[35] COTA Australia, State of the Older Nation 2025 – Summary Report. Available at cota.org.au/SOTON25

70% of older people told us that technologies need better design for older people and 33% of retirees feel they're being left behind by technology (unpublished SOTON25 data). A concerted focus on "confidence by design" standards and funded programs that build that confidence, via trusted community channels, is needed.

To fulfill the Strategic Plan's commitment to a "safe, trusted and accessible" system, the 2026-27 Federal Budget must ensure a robust regulatory framework that guarantees digital readiness before any further service withdrawal as well as the maintenance of non-digital options at all times. This mandate should include a strict prohibition on cash surcharges (the primary fallback for many digitally excluded) and a requirement for banks to maintain permanent viable non-digital pathways, such as telephone banking and face-to-face services. No physical banking services should be withdrawn until the digital confidence of that specific community is measurably demonstrated. Digital literacy and inclusion must be transformed from a vague goal into a funded reality through the payments system reform, so 2030 is defined by inclusion rather than exclusion.

By investing in "confidence by design" and protecting essential non-digital touchpoints the 2026-27 Federal Budget can ensure that as we transition away from the tools of the past, every Australian is included, can use the reformed payment systems and are able to manage their finances in a secure, dignified, and accessible way.

Recommendation 4: Ensure that banks facilitate supports for older Australians to increase their digital confidence in banking and retain access to essential banking services during and post the payment systems reforms.

Building digital confidence should include regulation that ensure:

- **A "Poverty Premium" Prohibition:** Regulation to prevent the application of surcharges on cash transactions, ensuring those who rely on non-digital currency are not financially penalized.
- **Guaranteed Service Standards:** Access to essential non-digital banking channels (such as telephone banking and over-the-counter services) remains a guaranteed, surcharge-free service standard for those unable to transition.
- **Mandatory Community Impact Assessments:** Banks must conduct comprehensive assessments prior to any physical service withdrawal. These assessments under the Banking Code of Practice and the ABA's Branch closure support protocol, must go beyond considering just geographic proximity of other services, to evaluate the individual digital readiness and specific needs of the local customers, including older digitally unconfident customers.
- **Measurable Digital Confidence Outcomes:** Digital literacy support is treated as a core service obligation, utilising nationally consistent, co-designed training programs delivered through trusted community channels rather than just bank-led digital marketing.

Department of Health, Disability and Ageing

5. Address aged care reform issues and announce a clear plan towards a single home and community based program.

COTA remains committed to the rights based aged care system that the Act promises, and the development of a single home and community based aged care program. One assessment should deliver a seamless 'continuum of care' (that can be scaled up or down), with services delivered within 30 days (from application to service delivery). Older people deserve transparent and accurate information on availability of services and prices. Quality services should be affordable, representing value for money for the taxpayer and the older person.

There are a number of implementation and design challenges that need to be addressed in the existing Support at Home program that commenced on 1 November 2025. These challenges must be addressed before an integrated (new) Support at Home program commences. Older people must not be negatively impacted by the change to a single program, and the system and providers must be ready to continue providing the level and quality of care needed at an affordable price.

Address Implementation issues of the current Support at Home Program

Older people's experiences of the implementation of the current Support at Home program, along with the ongoing impacts of some of the policy and program settings, have not been positive. As discussed in our submission to the Senate Select Inquiry into the transition of CHSP into Support at Home, these experiences include:

- Longer-than-expected delays in waiting for an assessment to be completed,
- Lack of ability for clinical professionals to override the outcome of the Integrated Assessment Tool,
- Offers of 60% interim packages providing insufficient support, with unclear timeframes for how long an interim package would apply and how their place in the queue would be managed if they declined it,
- Higher than reasonable price increases by some aged care providers, resulting in lower amounts of services able to be purchased,
- Publication of service prices were delayed (and for some providers, remain incomplete), resulting in older people being unable to compare prices before having to sign new agreements. Older people report feeling pressured to make an uninformed decision.
- Self-management, popular with some older people is not well supported or explained in the new system, including the allowed 10% administration charge being applied for what we would not regard as 'self-management' requested services.

Address design issues in the current Support at Home Program

Some policy decisions mean that the current Support at Home Program is not living up to the promise of providing quality affordable support at home. . Improvements are required before CHSP can be integrated into a new (merged) Support at Home Program:

- allowing older people to access multiple providers – to deliver services more efficiently (including by directly invoicing government) and increasing the capacity of older people to choose their preferred workers, compared to the current single package fund holder model involving onerous and multiple associated provider requirements on single service organisations and workers.
- care partners must be required to work in the 'best interest of' the participant. Whether they are embedded in a single provider who delivers care management and service delivery (as occurs today), or whether they are a specialist care management organisation just delivering care management, ensuring their advice and support for older people are in the best interest of the older person, not the provider, is paramount.
- reclassifying showering as a clinical service and removing the fiscal impact of older people rationing their personal care and health needs due to co-contributions. The absence of adequate hygiene support is a primary driver of acute medical crises, as evidenced by the rates of cellulitis, for example, among older Australians. [36] Cellulitis is now one of the top five most common preventable admissions for older Australians. A single complex hospital admission or a one-week delay in discharge costs the taxpayer more than an entire year of daily hygiene support. [37] By reclassifying showering as 'Clinical,' Government would be investing $120/week to avoid a $7,500/week avoidable hospital admission. In addition, the risk to a person

[36] Australian Institute of Health and Welfare. (2024). *Potentially preventable hospitalisations in Australia 2022–23*. AIHW. https://www.aihw.gov.au/reports/primary-health-care/potentially-preventable-hospitalisations. (Note: This report identifies the correlation between community-based support and the prevention of acute conditions like cellulitis in older cohorts).

[37] The average cost of a public hospital bed is estimated at $1,075 per day (NSW Government, *Health insurers rorting public hospital beds* (Media Release/Treasury Data, September 2024).

For Australians aged 85+, the AIHW reports an average length of stay of 6.2 days for acute conditions like cellulitis. For the 75+ cohort, the average ranges from 4.8 to 5.5 days if no significant comorbidities are present. Complex presentations can result in longer stays. (AIHW, *Cost of potentially preventable hospitalisations in Australia 2023–24* (Report, November 2025) 24).

Under the Support at Home price list (effective Dec 2025), the national median for a 30-minute "Personal Care" visit (showering/dressing) is approximately $58.30 for a weekday service. (Aged Care Decisions, *Support at Home Price List: Latest Updates* (December 2025))

If a 15minute visit for showering is all that is required, the cost drops to ~$40/visit, at three visits a week ($120) totalling $6,240 per year.

falling, increases if they have been assessed as unable to shower unaided. Falls account for 43% of all injury hospitalisations in Australia, with the home being the most common place of occurrence (44.2%).[38]

- banning package fund holders from requesting kickbacks from sub-contractors (which is adding overhead costs into the unit price).
- implementing price caps to remove unreasonable prices that have been permitted in the current system, and
- automating hardship for customers with low income and assets, at the same time as determining the client contribution rate, rather than requiring a separate application process.

Consult and Design the merged (new) Support at Home 2.0 Program

Creating an integrated program **does not** mean:

- A straight transition of CHSP into the existing approach in the current Support at Home Program;
- That all of the current CHSP service types have to be rolled into an individualised funding approach.

Rather, a blended approach to the future Support at Home services needs to be achieved.

The Royal Commission's vision that some services are better contracted by Government, with individual hours, meals or trips allocated to participants should be applied, particularly in relation to transport, meals, group/centre social support and cottage/centre respite has always had COTA Australia support.

The System Governor, not individual providers, must allocate to older people the funded places that Government purchases in order to address the numerous issues that older people experience with the current hidden CHSP provider managed waitlists.

Addressing the ability for an individual to 'book' their service utilising My Aged Care talking to provider IT infrastructure will begin to address the number one pain point reported by participants navigating aged care – a lack of accurate real-time availability of services – while also supporting choice, self-management and transparency.

A clear transition plan

A clear transition plan committing to the Government's agreed end state should be announced in the upcoming Budget. The transition plan should:

1) State the clear consumer outcome/s Government is committed to delivering as part of each phase,
2) Identify measurable readiness conditions for both providers and government required to deliver each phase. These readiness conditions should be regularly reported on publicly. Some of the readiness conditions may include policy/design and implementation issues we have outlined above,
3) Include clear timeframes for consultations, publishing of final design, IT build requirements completed, final rules and program guidelines being published and other implementation elements, and
4) At a minimum, identify quarterly milestones and six-monthly phases that maintain focus on Government progress to achieving its consumer outcomes that have been committed to.

COTA acknowledge the Government's commitment to deliver services to older people within 90 days by 30 June 2027 as part of its package of aged care reforms. While COTA continues to advocate that this should be reduced to 30 days, we welcome this commitment and believe demand analysis outlining targets to achieving the Government's commitment must be included in any transition plan to ensure that both Support at Home and CHSP pathways achieve the Government's wait time commitments.

Recommendation 5: Announce clear transition plan to implement the Government's commitment of a single home and community-based program, in which no participant waits more than 30/90 days from application to service commencement, milestones should include:

- Immediately, transfer the service type of personal care, at least for showering, to the 0% co-contributions clinical care service category.
- No later than 1 July 2026, implement price caps on Support at Home unit prices, and actively monitor unreasonable prices until they are introduced.
- No later than 1 July 2027, older Australian can direct Government to directly fund multiple registered providers to support them.
- From 1 July 2027, outline clear six-monthly phases towards the single support at home program (announced in the May 2026 budget).

6. Introduce a Seniors Dental Benefit Scheme

Oral health is a cornerstone of overall health and quality of life. Currently, a significant cohort of older Australians are effectively locked out of essential care. Nearly half (47%) of people over 65 reported debilitating oral issues including recent tooth or gum pain, mouth or face swelling, or a mouth infection, and make fewer trips to the dentist than the rest of the population.[39] The Australian Dental Association's (ADA) annual study of 25,000 people found in the last 12 months over half (55%) of all over 65s *delayed* seeking dental treatment, with 64% of them saying it was because they couldn't afford it.[40]

Essential Research found that 73% of all Australians support the introduction of a Seniors Dental Benefits Scheme.[41]

The prohibitive cost of private treatment and exhaustive waiting lists for public dental clinics create a dangerous bottleneck. For older Australians, this delay exacerbates susceptibility to chronic conditions, including dental decay, periodontal disease, and oral cancer. Timely, locally-accessible care is not just a matter of hygiene and physical health, it is a critical intervention that protects nutrition, social connectedness, and oral wellbeing.

A Seniors Dental Benefit Scheme would provide a sustainable pathway for those currently excluded from the system. By shifting the focus to preventive oral health care, the Government can support broader physical and mental health outcomes, reducing the long-term burden on the acute hospital system.

Recommendation 6: Introduce a Senior Dental Benefit Scheme with a focus on preventive oral health care to ensure aged pensioners, and older people receiving aged care services have timely locally - accessible and affordable services that enhance their oral wellbeing.

[39] Australian Dental Association. (9 April 2025). *Survey finds seniors' oral health worse than the rest of the nation*. https://ada.org.au/survey-finds-seniors-oral-health-worse-than-the-rest-of-the-nation

[40] Ibid.

[41] Essential Research, *Polling on older Australians' access to dental care*, research commissioned by COTA Australia, cited in COTA Australia, "*We need a Senior Dental Benefits Scheme, bulk-billed through Medicare,*" 2024, https://cota.org.au/project/we-need-a-senior-dental-benefits-scheme-bulk-billed-through-medicare/.`