COTA TASMANIA
for older Australians

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Submission: Sixth Social and Economic Impact Study of Gambling in Tasmania

1. Overview

Tasmania has the oldest population profile of any Australian state. At the 2021 Census, the median age in Tasmania was 42 years, compared with 38 nationally, and approximately 20.9 per cent of Tasmanians were aged 65 years or over, compared with around 17.2 per cent nationally.[i]

This demographic profile makes it particularly important that the Sixth SEIS explicitly considers the experiences and impacts of gambling among older Tasmanians rather than assuming they will be adequately captured within whole-of-population findings.

COTA Tasmania does not suggest that older people are inherently more susceptible to gambling harm. Nor do we suggest that gambling should not be recognised as a legitimate recreational activity for people who choose to participate within their means.

Older Tasmanians are a diverse population, and most people who gamble do so without experiencing significant harm.

However, where gambling-related harm does occur in later life, its nature and consequences may differ significantly from those experienced at younger ages.

Loss of savings can be considerably more difficult to recover after retirement; fixed or limited incomes can magnify the effects of gambling expenditure; and gambling may intersect with circumstances including bereavement, loneliness, social isolation, disability, cognitive impairment and caring responsibilities.

The impacts may also extend beyond the individual who gambles. Older people may experience harm as partners, parents, grandparents or carers of someone with gambling problems, including through financial pressure, depletion of shared resources and, in some circumstances, financial elder abuse.

COTA Tasmania's 2025 State of the Nation research[ii] provides relevant context. Among the Tasmanian respondents aged 50 years and over, 47 per cent were fully or partly retired, 58 per cent lived in regional areas and 21 per cent lived with disability. Only 57 per cent felt positive about their long-term financial security and one in five were living in poverty. Poverty was highest among respondents aged 75 years and over, at 27 per cent, and financial disadvantage was particularly concentrated among people living with disability.

The same research highlights other circumstances relevant to gambling policy. Loneliness was reported by half of female respondents and 43 per cent of male respondents aged 50 and over. Even among a relatively digitally confident survey sample, 44 per cent reported difficulty keeping pace with technological change and 69 per cent believed technologies needed to be better designed to meet the needs of older people.

These findings do not establish a relationship between ageing and gambling harm. They do, however, demonstrate why the Sixth SEIS should examine how gambling interacts with the financial, social and other circumstances of later life.

COTA Tasmania particularly welcomes the proposed expansion of the Sixth SEIS to consider harm experienced by affected others and legacy harm. Both concepts have particular relevance in later life, when the consequences of financial loss may be difficult or impossible to reverse and the effects of another person's gambling may extend to shared retirement resources, family support and caring responsibilities.

These issues matter because gambling harm is not experienced uniformly across the population. For older Tasmanians, financial losses may be less recoverable, social and health circumstances may compound harm, and the effects may extend beyond the individual to partners, families and carers. Unless the Sixth SEIS examines these dimensions explicitly, important impacts on Tasmania's ageing population may remain hidden within aggregate data.

Our submission therefore focuses on ensuring that:

- older Tasmanians are visible in the study's data and analysis;
- age is considered alongside income, disability, geography and other intersecting factors;
- the particular consequences of financial harm in later life are examined;
- cognitive impairment and financial decision-making capacity are considered within harm-minimisation arrangements;
- harm experienced by older people as affected others is identified;
- gambling help and harm-minimisation services are accessible to older people; and
- recent changes to Tasmania's gambling harm-minimisation framework are independently assessed for their effectiveness in protecting people who may be at increased risk of serious harm.

2. About COTA Tasmania

Council on the Ageing (COTA) Tasmania is the leading body representing the interests of older Tasmanians.

COTA Tasmania is an independent, non-partisan, not-for-profit organisation that works to advance the rights, interests and wellbeing of people as they age. Our work includes policy development and advocacy, community engagement, research, information and education, and contributing the perspectives and lived experience of older Tasmanians to government policy and decision-making.

COTA Tasmania works across a broad range of issues affecting people in later life, including financial security, housing, health and aged care, social connection, digital inclusion, transport, ageism and the prevention of abuse and exploitation.

We welcome the opportunity to contribute to the Sixth Social and Economic Impact Study (SEIS) of Gambling in Tasmania.

3. Recommendations

COTA Tasmania recommends that the Sixth SEIS:

1. Report gambling participation, gambling harm, affected-other harm and help-seeking by meaningful older age cohorts, including 65–74, 75–84 and 85 years and over where sample size permits.
2. Examine the particular nature and consequences of gambling-related financial harm in later life, including the impact of losses on retirement savings, housing security and people living on fixed or limited incomes.
3. Examine relationships between gambling harm and major later-life transitions and circumstances, including retirement, bereavement, loneliness, social isolation and caring responsibilities.
4. Consider cognitive impairment and reduced financial decision-making capacity as part of gambling harm prevention and responsible gambling frameworks, including the adequacy of venue practices and exclusion arrangements.
5. Assess harms experienced by older people as a result of another person's gambling, including financial, caring, family and elder-abuse impacts.
6. Assess the accessibility and effectiveness of gambling support and harm-minimisation services for older Tasmanians, particularly people living in rural and regional communities, people with disability and people who are not confident accessing digital services.
7. Evaluate whether Tasmania's current harm-minimisation measures provide effective protection for vulnerable consumers following the decision not to proceed with mandatory pre-commitment for electronic gaming machines.

4. Detailed Comments

4.1 Older Tasmanians should be explicitly visible in the Sixth SEIS

Older Tasmanians are not a homogeneous population. A person entering retirement at 65 may have very different financial, social and health circumstances from a person aged 85 or older. Combining all older people into a single broad age category risks concealing important differences in gambling participation, gambling products used, vulnerability, harm and access to support.

Where sample sizes permit, findings should therefore be presented separately for people aged 65-74, 75-84 and 85 years and over. Intersections between age and income, housing status, geographic location, disability, household composition and digital access should also be examined.

This is particularly important in Tasmania because of the age profile of the population and because financial and social disadvantage are not evenly distributed among older people.

COTA Tasmania's 2025 State of the Nation analysis reinforces this point. The Tasmanian sample included 217 respondents aged 50 years and over. Of these, 47 per cent were fully or partly retired, 58 per cent lived in regional areas and 21 per cent lived with disability.

The findings also highlighted persistent gaps in quality of life and financial security for people living with disability, people in poverty and other vulnerable groups, together with significant cost-of-living and service-access pressures.

This provides a strong basis for ensuring that the Sixth SEIS examines not simply age in isolation, but the intersecting circumstances that may increase the seriousness or duration of gambling-related harm.

4.2 Gambling harm in later life may have different consequences

The consultation paper[iii] appropriately identifies financial stress, debt and bankruptcy among the principal harms that may arise from gambling.

For many older people, however, the impact of financial loss may differ significantly from that experienced earlier in working life.

A person who loses significant savings at 40 may have decades of employment ahead in which to rebuild assets. An older person who experiences the same loss after retirement may have little or no opportunity to replace those funds.

Potential consequences may include:

- depletion of superannuation or retirement savings;
- increased reliance on the Age Pension or other income support;
- inability to meet housing, health, energy or other essential costs;
- housing insecurity;
- increased dependence on family members;
- reduced capacity to pay for care and support later in life; and
- enduring financial hardship.

COTA Tasmania's 2025 State of the Nation findings reinforce the importance of examining gambling losses in this context. Among Tasmanian respondents aged 50 and over, only 57 per cent felt positive about their long-term financial security and one in five were living in poverty. Poverty was highest among respondents aged 75 years and over, at 27 per cent, compared with 21 per cent among those aged 50-66 and 10 per cent among those aged 67-74. Financial disadvantage was also particularly concentrated among people living with disability.

These findings underline why gambling losses should be assessed relative to income, assets and capacity to recover, rather than simply in absolute dollar terms.

The concept of legacy harm, which the Sixth SEIS proposes to measure, is especially relevant in this context. Financial damage incurred in later life may persist for many years and, in some circumstances, for the remainder of a person's life.

4.3 Retirement, bereavement, loneliness, and social isolation

Later life can involve significant transitions, including retirement, bereavement, changing family relationships, declining health and reduced social contact.

These experiences should not automatically be characterised as risk factors. However, they may influence why, where and how frequently some older people gamble and should therefore be considered in the study.

COTA Tasmania's State of the Nation findings demonstrate that loneliness is a material issue among older Tasmanians. Half of female respondents aged 50 and over reported feelings of loneliness, compared with 43 per cent of male respondents.

This does not establish a causal relationship between loneliness and gambling, and COTA Tasmania does not suggest that it does. It does, however, reinforce the importance of examining whether loneliness, bereavement or social isolation influence gambling frequency, venue attendance or gambling-related harm in later life.

There is also an important balance to be recognised. Gambling venues can provide social interaction, meals, entertainment and community connection. The issue is therefore not simply whether older people attend or gamble, but why they do so, how often, in what circumstances, and with what consequences.

The Sixth SEIS should seek to distinguish between the legitimate social and recreational value of venue attendance and the harms associated with gambling products themselves.

4.4 Electronic gaming machines

Electronic gaming machines warrant particular attention.

The consultation paper identifies EGMs as the gambling form most strongly associated with gambling-related harm and notes their continuing prevalence in Tasmanian hotels, clubs and casinos.

COTA Tasmania recommends that the Sixth SEIS examine EGM participation and harm by age, including:

- frequency of use;
- duration of gambling sessions;
- expenditure relative to income;
- motivations for venue attendance;
- the relationship between social isolation and venue-based gambling;
- geographic accessibility of machines; and
- the extent to which EGM-related harm affects older people with fixed or limited incomes.

Aggregate prevalence data alone may not adequately identify these patterns.

4.5 Harm minimisation and the mandatory pre-commitment proposal

Tasmania's gambling harm-minimisation framework has changed substantially since the previous SEIS.

The Government previously proposed mandatory pre-commitment for EGM gambling, but that policy was subsequently deferred and the relevant Ministerial Direction was rescinded in June 2026. An alternative package now includes longer mandatory shutdown periods, TITO transaction limits, immediate self-exclusion using QR codes and mandatory facial recognition to support enforcement of exclusion arrangements.

COTA Tasmania considers it important that the Sixth SEIS independently assesses the effectiveness of these measures. In particular, the study should assess whether the alternative package provides protections equivalent to or better than those anticipated under mandatory pre-commitment, especially for people who may experience financial vulnerability, reduced impulse control or impaired decision-making.

The assessment should be evidence-based and should not assume that the existence of a harm-minimisation measure necessarily demonstrates its accessibility or effectiveness.

4.6 Cognitive impairment and financial decision-making

COTA Tasmania is concerned that cognitive impairment and reduced financial decision-making capacity receive little explicit attention in the consultation paper.

This is an important omission.

The prevalence of cognitive impairment and dementia increases with age, and some people may experience declining financial decision-making capacity well before a formal diagnosis or the appointment of a substitute decision-maker.

Gambling involves repeated financial decisions, including in environments and through products designed to facilitate continued participation. Harm-minimisation arrangements should therefore be capable of responding appropriately where a person's ability to recognise or regulate harmful gambling behaviour is impaired.

The Sixth SEIS should consider:

- whether venue staff receive adequate training to recognise potential cognitive vulnerability;
- how responsible gambling obligations operate where a patron's decision-making capacity may be impaired;
- whether existing intervention and exclusion mechanisms are sufficiently accessible to families and carers;
- whether third-party exclusion arrangements work effectively in practice;
- how privacy, dignity and autonomy are balanced with protection from serious financial harm; and
- whether additional guidance is required for venues dealing with patrons who may have impaired decision-making capacity.

The Tasmanian Gambling Exclusion Scheme already provides mechanisms for third-party exclusion in some circumstances. The Sixth SEIS provides an opportunity to assess whether these arrangements are understood, accessible and effective for older people and their families.

4.7 Older people as "affected others"

COTA Tasmania strongly welcomes the Sixth SEIS's intention to measure harm experienced by people as a result of someone else's gambling. Gambling harm should not be understood only as harm to the person gambling.

For older people, harm from another person's gambling may arise in several ways.

An older parent may provide repeated financial assistance to an adult child experiencing gambling problems. Grandparents may assume greater financial or caring responsibility for grandchildren where household income is being lost through gambling. An older spouse or partner may have retirement savings depleted by another person's gambling.

Gambling may also intersect with financial elder abuse, including pressure on an older person to provide money or access savings to meet another person's gambling debts.

It is therefore important that the Sixth SEIS report the age and circumstances of affected others, not merely the characteristics of the person gambling.

Without this analysis, an important dimension of gambling-related harm to older Tasmanians may remain largely invisible.

4.8 Access to gambling help and support services

The consultation paper identifies a range of face-to-face, telephone and online gambling support services.

COTA Tasmania welcomes the availability of multiple service channels but cautions against equating service availability with service accessibility.

For older people, barriers may include:

- geographic distance and limited transport options;
- disability or mobility limitations;
- hearing or communication difficulties;
- limited digital access or confidence;
- reluctance to identify gambling as a problem or seek specialist assistance;
- concerns about stigma or privacy; and
- lack of awareness that support is also available to people affected by someone else's gambling.

The Sixth SEIS should therefore assess not simply whether services exist but whether older Tasmanians can and do access them, whether they are regarded as appropriate and welcoming, and whether unmet need exists in rural and regional communities.

COTA Tasmania's State of the Nation findings also caution against assuming that digital solutions are universally accessible or appropriate for older people. Even among a relatively digitally confident survey group, 44 per cent reported difficulty keeping pace with technological change and 69 per cent believed technologies needed to be better designed to meet older people's needs.

Telephone, face-to-face and non-digital pathways should therefore remain available. Increasing reliance on digital self-service mechanisms should not inadvertently exclude people who have limited digital access or confidence.

4.9 Online gambling

Online gambling introduces a different set of opportunities and risks.

For some older Tasmanians, lower digital participation may currently reduce exposure to some forms of online wagering. However, this should not lead to an assumption that online gambling is principally a younger-person issue.

As internet and smartphone use increases among successive cohorts of older people, exposure is also likely to increase.

Online gambling can take place privately and continuously from home, which may make harmful patterns less visible to family members, friends or service providers.

The Sixth SEIS should therefore establish an age-based baseline for online gambling participation and harm that can be monitored in future studies.

This should include consideration of the intersection between growing digital participation among older people and the accessibility of online gambling products, advertising, inducements and harm-minimisation tools.

4.10 Ensuring older people's voices are reflected

COTA Tasmania's State of the Nation findings indicate that more than half of respondents believed government policies were not meeting the needs of older people. This view was particularly strong among people living with disability.

This reinforces the importance of ensuring that older people are not merely included statistically in the Sixth SEIS but are meaningfully reflected in its design, analysis and interpretation.

COTA Tasmania encourages the study team to ensure older Tasmanians, including those experiencing financial disadvantage, disability, rural isolation and limited digital access, are appropriately represented in qualitative as well as quantitative research.

5. Conclusion

COTA Tasmania welcomes the broader approach to gambling harm proposed for the Sixth SEIS, particularly the inclusion of harm experienced by affected others and the recognition of legacy harm.

However, Tasmania's population profile means older people should not disappear within whole-of-population averages.

Older Tasmanians are diverse and most who participate in gambling do so without significant harm. At the same time, where gambling-related harm does occur in later life, the consequences may be particularly serious and difficult to reverse.

Loss of retirement savings, reduced capacity to recover financially, loneliness and major life transitions, cognitive impairment, rural isolation and harm arising from another person's gambling all require specific consideration.

COTA Tasmania therefore urges the Sixth SEIS to include meaningful age-disaggregated analysis and to examine the nature, severity and duration of gambling harm experienced by older Tasmanians.

Doing so will provide government, regulators and the community with a much clearer understanding of the benefits and harms of gambling across Tasmania's population and help ensure that future harm-minimisation measures are responsive to the needs of people at every stage of life.

[i] Australian Bureau of Statistics, *2021 Census All persons QuickStats – Tasmania*, 2021 Census of Population and Housing. https://www.abs.gov.au/census/find-census-data/quickstats/2021/6

[ii] The State of the Older Nation 2025 report is a nationally representative survey of older Australians prepared by SEC Newgate for COTA Australia and is the fourth in the SOTON series. Link here: COTA Australia Report- State of the Older Nation 2025

COTA Tas has prepared a summary of the Tasmanian data from the national report. Link here: COTA Tas Briefing Note - SOTON Analysis Tas 2025.pdf

COTA Tasmania recognises the limitations of the Tasmanian SOTON data.

The sample was relatively small, the survey was conducted online and the sample may therefore over-represent digitally confident respondents. The briefing paper itself cautions that the findings cannot necessarily be considered fully representative of the broader older Tasmanian population.

COTA Tasmania has therefore used these findings to identify issues warranting further examination rather than as definitive prevalence estimates for all older Tasmanians.

This limitation itself reinforces the importance of ensuring the Sixth SEIS is designed to capture the experiences of older people who may be less likely to participate in online surveys, including people with limited digital access, disability or cognitive impairment.

[iii] CQUniversity Experimental Gambling Research Laboratory and Ipsos Australia, *Sixth Social and Economic Impact Study of Gambling in Tasmania: Consultation Paper*, Tasmanian Department of Treasury and Finance, July 2026. https://www.treasury.tas.gov.au/Documents/Sixth%20SEIS%20-%20Consultation%20paper.pdf