SUPER MEMBERS COUNCIL

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2024-25 Pre-budget submission

About the Super Members Council

Our primary purpose is to protect and advance the interests of super fund members throughout their lives, while earning superannuation at work and benefitting from it in retirement. The Super Members Council (SMC) advocates on their behalf to ensure superannuation policy is stable, effective, and equitable.

Jointly created by the super funds who were members of the Australian Institute of Superannuation Trustees and Industry Super Australia, the new body builds on their legacies to provide member-centric advocacy. It will work with all political parties to deliver the best possible retirement outcomes for members.

Introduction

Australia's superannuation system is ranked among the best in the world and has delivered a more dignified retirement to many millions of Australians over the last 30 years. With this success also comes a responsibility to keep improving super, ensuring its benefits are enjoyed by as many people as possible.

The system settings of superannuation do not achieve an equitable outcome for all that are part of it. A more equitable super system will lead to fairer and better outcomes for members in retirement and will go some way to assisting those who are being left behind when it comes to building their super balances – especially women, First Nations Australians and those on lower incomes.

The forthcoming Federal Budget presents an ideal opportunity to not just celebrate the successes of recent decades, but to acknowledge that our world-class super system can and must be fairer, and more equitable as it helps to deliver more adequate retirement incomes.

A full list of our recommendations is outlined in the next section of this submission. They include recommending the Government take steps to:

- Reduce the gender super gap by paying super on Commonwealth paid parental leave and adjusting the thresholds for the Low Income Super Tax Offset (LISTO).
- Improve equity for Indigenous Australians by recognising kinship arrangements.
- Improve the retirement for members of super funds by providing access to data that will assist funds in tailoring their approach to retirement outcomes.

- Improve outcomes for thousands of workers by ensuring the ATO are appropriately resourced to improve compliance with superannuation obligations by setting concrete targets for compliance action.

SMC Recommendations

Fairness & Equity

- **Recommendation 1:** Mandate payment of super with the Commonwealth Parental Leave Pay Scheme.
- **Recommendation 2:** Increase the Low-Income Superannuation Tax Offset (LISTO) to cover workers earning up to $45,000 and increase the payable amount to align with the yearly increase to SG.
- **Recommendation 3:** Increase the workforce participation of parents by investing in policies that improve access to childcare, including adopting the recommendations of the Productivity Commission's inquiry into early childhood education and care.
- **Recommendation 4:** Improve equity in the superannuation system for Aboriginal and Torres Strait Islander people by recognising kinship structures.
- **Recommendation 5:** Mandate that all workers under the age of 18 be paid super regardless of the number of hours they work.

Improve retirement outcomes

- **Recommendation 6:** Fund a data-sharing framework for enhanced implementation of the retirement income covenant.

Improve compliance with the superannuation guarantee

- **Recommendation 7:** SMC recommends that the Budget:
    - set targets for the Australian Taxation Office for the recovery of unpaid Superannuation Guarantee amounts in 2024-25 and subsequent years;
    - identify specific superannuation contributions tax revenue amounts aligned with Australian Taxation Office targets for the recovery of unpaid Superannuation Guarantee amounts in 2024-25 and subsequent years; and
    - provide the ATO with additional funding for it to be able to guarantee that it will be able to set and achieve performance targets for the recovery of unpaid Superannuation Guarantee amounts in 2024-25 and subsequent years.

Submission

Tackle inequity in the super system

The gender retirement gap is a known equity issue and one that must be tackled. Women make up half our population and typically retire earlier and live longer than men, but today retire with a third less super than men. This gender gap begins to increase significantly when women are aged between 30 and 45, coinciding with a reduction in paid work to have and care for children. The drivers for this gap are well known - women spend more time out of the workforce, are more likely to undertake part time or casual work than men and earn less on average than men while they are working.

One in three women retire with no super at all. This has significant consequences for women's financial security in retirement, while taxpayers also bear the impact with women over-represented in pension payments. Women over 55 are also the largest growing cohort at risk of homelessness[1].

Fully addressing the gender super gap is a long-term project that will take society-wide change, but there are two measures the government could take immediately which would improve retirement outcomes for women, they are:

- legislating the payment of superannuation on all forms of parental leave and
- Realigning the settings underlying the Low-Income Super Tax Offset (LISTO).

In addition, the government should continue to progress policies aimed at improving the affordability of and access to childcare.

While not specifically targeted at women, women will overwhelmingly be the beneficiaries of such changes as they take more time out of the workforce to care for children and are overrepresented in Australia's low paid workforce, including workers in the care and education sectors.

Boosting the retirement savings of working mothers

Taking leave from paid employment to have and care for children remains a significant contributing factor to the gender super gap as super is not required to be paid on any kind of parental leave. This contrasts with other types of commonly taken leave such as annual leave, paid sick leave and long service leave.

While it is heartening to see that 86% of employers that offer employer-funded parental leave voluntarily pay superannuation on that leave[2], parents who rely on the Commonwealth's Parental Leave Pay scheme (the Scheme) are at a disadvantage.

The overwhelming majority of parents who use primary carer leave through the Commonwealth Scheme (99.5%) and employer-funded schemes (88%) are women[3].

Cameo analysis by SMC shows a mother of two who received super on the Scheme would be $14,500 better off in retirement. A mother of one child would be $7,500 better off. With the typical woman retiring with $67,000 less than their male counterpart, this would make a meaningful reduction in their super gap.

Parents have missed out on $2.5 billion in super contributions since the Scheme began to June 2023, the majority of which would have accrued to women.

We acknowledge the Government has indicated it is supportive of paying super on Commonwealth Paid Parental Leave when the fiscal circumstances permit, and we would encourage the Government to prioritise this as a vital step needed to address this embedded system inequity.

Recommendation 1: Mandate payment of super with the Commonwealth Parental Leave Pay Scheme.

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[1] Older Women's Risk of Homelessness: Background Paper (2019) | Australian Human Rights Commission, April 2019; The Conversation, 400,000 women over 45 are at risk of homelessness in Australia (theconversation.com), August 2020
[2] Workplace Gender Equality Agency, Australia's Gender Equality Scorecard 2022-23 (wgea.gov.au), November 2023
[3] Women's Budget Statement 2022-23, October 2022

Updating the low-income superannuation tax offset

The low-income superannuation tax offset (LISTO) was originally designed to make the super tax system fairer for low-income earners by ensuring they did not pay more tax on their super contributions than on their take-home pay.

The LISTO currently refunds the 15% tax on super contributions, up to a maximum of $500, for workers earning up to $37,000 per year.

These settings were established at a time when $37,000 represented the top of the second income tax bracket and the super guarantee (SG) rate was fixed at 9% of ordinary time earnings. Tax cuts and the welcome legislated increases in the SG rate now mean that many individuals in the second tax bracket are no longer eligible for the LISTO, and those that are eligible are not receiving a full refund of the tax paid on their contributions, meaning they pay more tax on their super than their take home pay. This does not align with the broader concessional nature of superannuation, compensating people because they are 'forced' to save through compulsory superannuation with access limited until retirement age.

Realigning eligibility and increasing the offset amount through minor adjustments to the framework will go some way to making super tax settings fairer for low-income earners.

Changes needed to ensure LISTO operates as originally intended

	SG rate	Legislated		Revised Policy	
		Amount	Threshold	Amount	Threshold
2023-24	11.0%	$500	$37,000	$750	$45,000
2024-25	11.5%	$500	$37,000	$780	$45,000
2025-26	12.0%	$500	$37,000	$810	$45,000

Implementing these changes would boost the super of more than 1.2 million Australians – 60% of whom are women working in lower paying jobs or on a part-time basis – who will benefit from an extra $500 million in 2025-26.

Recommendation 2: Increase the Low-Income Superannuation Tax Offset (LISTO) to cover workers earning up to $45,000 and increase the payable amount to align with the yearly increase to SG.

Improving workforce participation through affordable & accessible childcare

Numerous studies[4] have found that access to affordable, quality childcare reduces the 'motherhood penalty' on labour market outcomes such as earnings, superannuation and career progression by enabling mothers and other primary carers to increase their participation in paid work.

While some parents actively choose to not work or work part time in order to care for their children, for many, the costs, availability and flexibility of childcare can act as barriers to workforce participation.

Women's workforce participation – key statistics [5]

	2022-23	2020-21
Main reason not available to start a job or more hours - Caring for children	35.9%	24.7%

[4] See Early childhood education and care - Public inquiry - Productivity Commission (pc.gov.au),November 2023; Cheaper childcare: A practical plan to boost female workforce participation - Grattan Institute, August 2020

[5] Australian Bureau of Statistics (ABS) Barriers and Incentives to Labour Force Participation, Australia, 2022-23 financial year | Australian Bureau of Statistics (abs.gov.au)

Mothers with children under 15	1.7 million	1.8 million
Main reason not available to start a job or more hours - Caring for children (with children under 15)	75.2%	56%
Main reason childcare was a barrier to participation - Mothers who wanted a job or more hours but unavailable		
Preferred to look after children	29.6%	35.4%
Childcare not available, booked out, or none in locality	27.7%	13.3%
Children too young or too old for childcare	16.6%	27.2%
Childcare costs too expensive	11%	15%
Other childcare reasons	9.8%	4.8%
Incentives – mothers with children under 15		
Ability to work part-time hours	67.6%	64.0%
Financial assistance with childcare costs	52.8%	47.9%
Access to childcare places	51.2%	48.8%

Recent changes to the childcare subsidy to improve the affordability of childcare for more than 1.2 million families are expected to boost the labour force participation of parents of young children. While this is a positive step forward, more can be done to reform the childcare system.

According to the Productivity Commission draft finding 4.4[6]:

> *If all reported ECEC-related barriers were removed, it is estimated that the equivalent of an additional 44,000 full-time workers among those wanting a job or more hours could be added to the labour supply. These would mostly be mothers from lower income households, those with younger children (aged 0-4 years), those who are more likely to have not completed high school and those who are single parents.*
>
> *If parents who reported not wanting a job or to work more hours and for whom ECEC-related barriers are the main reason for this status are included in the estimate, then the equivalent of 118,000 full-time workers could be added to labour supply.*

This would lead to a range of developmental, social and educational benefits for children accessing care and economic benefits for the national GDP and tax revenue, in addition to the direct benefits to women achieved through strengthening their attachment to the labour force.

ISA modelled the impact of increased female participation on superannuation outcomes and the retirement gender gap[7]. They found that overall, women's accumulation balances would be an average of $11,000 higher by 2050 if the right incentives were provided to lift mothers' participation during their children's pre- and primary school years.

On an individual basis, a median income mother could increase her retirement balance between 5-20% (up to $118,000 more), and a low-income mother could increase her retirement balance between 8-23% (up to $69,000 more), by increasing participation from 2 days a week by an additional 1-3 days for a decade. This would increase household retirement income and reduce reliance on the Age Pension.

SMC therefore strongly supports the recommendations of the Productivity Commission and the commitment from government to chart the course for universal, affordable, accessible, equitable and high-quality early childhood education and care.

[6] Ibid
[7] Industry Super Australia. Narrowing the gap by making childcare more affordable » Industry Super, March 2022

Recommendation 3: Increase the workforce participation of parents by investing in policies that improve access to childcare, including adopting the recommendations of the Productivity Commission's inquiry into early childhood education and care.

Indigenous super

There is a life expectancy gap between Aboriginal and Torres Strait Islander peoples and non-Indigenous Australians.[8] This gap, expressed across all age groups, means Aboriginal and Torres Strait Islander peoples are less likely to reach the superannuation preservation age of 60 years. This results in many Indigenous Australians dying with unspent retirement savings. The way these death benefits are treated under current tax and superannuation law increases the existing inequities between Indigenous and non- Indigenous Australians.

While efforts continue to eliminate inequality for First Nations peoples, SMC believes that improved equity can be achieved for Aboriginal and Torres Strait Islander people in the superannuation system with the recognition of kinship structures in the payment of death benefits.

Life expectancies and mortality rates

According to ABS data[9], in 2020-2022, the life expectancy at birth for Aboriginal and Torres Strait Islander people was substantially lower than non-Indigenous Australians, and lower again in remote and very remote areas of Australia.

Life expectancy gap - Indigenous and non-Indigenous Australians

	Males	Females
Non- indigenous Australians - life expectancy at birth	80.6	83.8
Indigenous Australians - life expectancy at birth	71.9	75.6
Life expectancy gap relative to non-indigenous Australians	8.8 years	8.1 years
Indigenous Australians living in remote or very remote areas	67.3	71.3
Life expectancy gap compared to non-Indigenous Australians living in major cities	13.3 years	12.5 years

Mortality rates for Aboriginal and Torres Strait Islander people are also higher than non-Indigenous Australians across all ages, impacting the likelihood of attaining preservation and accessing their super. The largest differences were for males in their 30s and females in their 30s and early 40s where mortality rates for Aboriginal and Torres Strait Islanders were roughly more than four times the rates for non-Indigenous people.

Isolating data for Australians at or after preservation age, Aboriginal and Torres Strait Islander people aged 50 to 65 were likely to live for less time than non-Indigenous Australians. For instance, an Aboriginal or Torres Strait Islander man aged 65 would live on average 3.9 years less than a non-Indigenous Australian. A female in the same cohort would live 4.4 years less than a non-Indigenous Australian.

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[8] Australian Bureau of Statistics (ABS), Aboriginal and Torres Strait Islander life expectancy lower in remote and very remote areas, 29 November 2023
[9] Australian Bureau of Statistics (ABS), Aboriginal and Torres Strait Islander life expectancy, 29 November 2023

These figures point to the sad reality that for many indigenous Australians, super is significantly more likely to be left as a bequest than used to support their retirement.

Superannuation is an integral part of Australia's retirement income system. For most Australians, superannuation is one of their largest assets.[10] The ABS data and research findings collectively reflect a growing recognition of the need for our financial systems, including the superannuation system, to be more responsive to the cultural and socioeconomic realities of Aboriginal and Torres Strait Islander people.

SMC considers that a more culturally aligned superannuation system to support First Nations peoples is one element that may contribute to improving overall equity for Aboriginal and Torres Strait Islander peoples.

Improving equity in superannuation for First Nations peoples

The Government has proposed a legislated objective of superannuation that will 'preserve savings to deliver income for a dignified retirement, alongside government support in an equitable and sustainable way.'[11]

In contrast to this objective, the May 2020 Research Report *Aboriginal and Torres Strait Islander Australians and the Superannuation System* identified that due to their lower life expectancy, many First Nations peoples 'viewed their superannuation as inheritance for their children or family, with limited interest in superannuation as a means to improve their own standard of living in retirement.' [12]

Recognition of the unique cultural perspectives of First Nations peoples on wealth, sharing, and relationships are critical to improved access of beneficiaries to superannuation. As such, SMC recommends changing the superannuation and tax legislative framework to recognise Aboriginal and Torres Strait Islander culture to improve equitable outcomes.

The traditional social structure of Aboriginal and Torres Strait Islander communities is based around broader kinship systems that adopt a different definition of a family compared with that of an 'Anglo-Celtic' system. These traditional kinship arrangements are not recognised within the superannuation system. As superannuation law uses specific definitions of 'dependant' and 'interdependency relationship' when determining death benefit claims, the use of these definitions may result in people who are considered to be dependants within Aboriginal and Torres Strait Islander kinship structures not being, or encountering difficulties being, recognised as dependants for the purpose of superannuation death benefit distributions. This leads to two key problems – the first is the family member may not be recognised as a beneficiary, second, if they are they may not be recognised as dependent and therefore the death benefit is taxed at a higher rate.

Achieving recognition would require legislative change. Legislative change includes revising section 10 of the *Superannuation Industry (Supervision) Act 1993* (SIS Act) to introduce a broader definition of dependency to explicitly recognise Aboriginal and Torres Strait Islander kinship structures and section 302-195 of the *Income Tax Assessment (ITAA) Act 1997* by introducing an additional definition of death benefit dependents that recognises Indigenous kinship structures (in line with the broader definition proposed under the SIS Act amendments).

[10] Australian Bureau of Statistics (ABS) Household Income and Wealth, Australia, 2019-20 financial year | Australian Bureau of Statistics (abs.gov.au) , Australia 2019-20.
[11] The Treasury, Legislating the objective of superannuation consultation paper, 20 February 2023
[12] Bank West Curtin Economics Centre, BCEC Report Aboriginal and Torres Strait Islander Australians and the Superannuation System, June 2020

Recommendation 4: Improve equity in the superannuation system for Aboriginal and Torres Strait Islander people by recognising kinship.

Removing the exemption from mandatory super for workers under the age of 18

Workers under the age of 18 only receive the mandatory superannuation guarantee if they work more than 30 hours a week for the same employer. Because most under-18s (92%) work fewer than 30 hours a week, most miss out on super contributions.

In the long term this exemption denies a young person of the benefits of investment earnings and compound interest. ISA analysis[13] shows that removing this exemption would mean the average young person would have $2,600 in their super by the time they turn 18, projected to grow to $10,200 by the time they retire.

In addition to the long-term financial benefits to workers' retirement savings, and by extension the federal budget, extending super to under-18s would:

- Reduce the administrative burden on employers by removing the need to monitor whether their young workers' hours exceed the threshold.
- Encourage better compliance with employer SG obligations and reduce the incidence of non-or underpayment of remuneration by treating all employees equally and removing ambiguity for workers about their entitlements.
- Encourage young workers to engage with the super system sooner, allowing funds greater opportunity to enhance financial literacy via targeted member education.

This measure would be a natural extension of steps already taken to make the super system more inclusive. While older workers no longer need to earn $450 a month to be entitled to super, under-18s continue to miss out. Further, protections for low balance accounts have removed historical concerns about balance erosion and the value of providing super for these cohorts of workers.

Recommendation 5: Mandate that all workers under the age of 18 be paid super regardless of the number of hours they work.

Data sharing framework

Increasing numbers of Australians are moving into retirement, with estimates that more than 2.5 million Australians will retire in the next decade. Super funds are endeavouring to provide their retiring members with appropriate retirement solutions to ensure their members are well placed financially in their later years.

In addition, the Retirement Income Covenant requires fund trustees to improve outcomes for their members approaching and in retirement through the development of retirement income strategies tailored to their members' circumstances.

To ensure funds are able to deliver on this covenant, trustees need access to vital quality information about their members that is not readily available outside of personal advice, and unlikely to be collected from a substantial number of members through direct outreach.

[13] Industry Super Australia. Super start to work - Extending the Super Guarantee to all under-18-year-olds. July 2023

In reviewing implementation of the Covenant[14], APRA and ASIC identified that many trustees had gaps in critical member data, both around members' financial position and income needs in retirement. The Treasury discussion paper on the Retirement phase of superannuation[15] further identified that 'Data is a critical input for funds to provide better retirement income strategies'.

Establishing a robust data-sharing framework for government agencies such as the ATO to release de-identified data would assist trustees with their obligations. Having access to other de-identified data sets, including those from Services Australia (e.g., Centrelink payment statistics, Child Support statistics, etc.) would provide a clearer stream of information that will assist trustees to determine the key characteristics of cohorts of their membership and any sub-classes within it.

While SMC anticipates much of this sharing will be on an aggregated and deidentified basis, it could also include notification to super funds when their individual members commence a full or part age pension. This would enable a fund to communicate with their members about their superannuation at or near the time when they have made other important retirement decisions and to optimise the outcomes for their members.

The Treasury discussion paper noted the options to both improve data sharing arrangements and receive data enabled by the Consumer Data Right (CDR), and observed:

> *This might assist funds in better supporting their members to understand their overall retirement income position and a retirement strategy that best suits their needs.*[16]

However, the Consumer Data Right alone is unlikely to deliver benefits across all cohorts of members, as there will be a proportion (possibly substantial) who do not take up CDR – this has already been demonstrated in banking.

SMC submits that funding for government agencies to develop a data sharing framework for enhanced implementation of the retirement income covenant would complement (and not be an alternative) to other ways of improving data.

The framework should be developed using the existing cross-agency process for retirement income products[17]. The cross-agency process seeks to provide a streamlined pathway for product providers to engage with the ATO, APRA, ASIC and the Department of Social Services via a single-entry point, reducing the current administrative burden of product providers contacting these agencies separately.

The overall aim of this improved data sharing is to allow funds to deliver more tailored and targeted retirement solutions for their different cohorts of members, allowing as many members as possible to maximise their retirement outcomes.

Recommendation 6: Fund a data-sharing framework for enhanced implementation of the retirement income covenant.

Resourcing the ATO to reduce unpaid super

Wage and superannuation underpayment not only costs individual workers but also impacts the national economy. The victims of wage and superannuation theft are predominantly the workers who have the

[14] Australian Prudential Regulation Authority (APRA) and the Australian Securities and Investments Commission (ASIC), REP 766 Implementation of the retirement income covenant: Findings from the APRA and ASIC thematic review, 18 July 2023.
[15] The Treasury, Retirement phase of superannuation. Discussion paper, December 2023.
[16] Ibid, p. 12.
[17] Cross-agency process for retirement income stream products | APRA

least power to seek recourse from their employers, and most require protections to guarantee their entitlements are paid.

While the proposed Payday Super reforms will improve employer compliance with superannuation obligations once the measures are implemented in 2026, measures that contribute to enforcement and recovery of shortfall amounts should be an ongoing priority that is strengthened in the intervening period.

Targets for compliance activities

Both the government[18],[19] and the ATO[20] have made strong commitments to setting public targets for the ATO's unpaid super compliance activities, affirmed by the 2023 Budget papers[21], [22].

However, subsequent lack of progress in setting targets is reflected in the absence of specific targets in the ATO Corporate Plan 2023-24[23] and Annual Report 2022-23[24] despite the comment in the Budget that actual performance targets will be reported in this document. The latter document's analysis of the Superannuation Guarantee Scheme, while identifying and providing commentary on the size of the gap, also does not mention any specific target or work being undertaken on the development of the target.

It is critically important that measures of success in the form of targets be put in place from 2024-25.

Resourcing compliance activities

The 2023 Budget papers provided further details of additional resourcing for the ATO and identified additional receipts.

However, the additional receipts of $835.0 million were only scheduled to be received from 2026-27: that is, there did not appear to be any additional receipts in the preceding years resulting from increased ATO compliance activities.

December's Mid-Year Economic and Fiscal Outlook 2023-24 identified an expected increase in Superannuation Guarantee payments. However, this appears to relate to changed employment estimates rather than enhanced targets for the ATO for the recovery of payments:

> *[...] payments related to the Superannuation Guarantee Scheme, which are expected to increase by $332.1 million in 2023-24 and $1.5 billion over four years to 2026-27, largely reflecting higher-than-expected payments disbursed by the Australian Taxation Office (ATO) to employees under the Superannuation Guarantee Scheme payment program. The increase in payments is accompanied by a corresponding receipt increase in the ATO's Superannuation Guarantee charge by $1.7 billion over four years to 2026-27.*[25]

Provision of appropriate resourcing of the ATO to support compliance with employer SG obligations is integral to fulfilling the Government commitment to reducing unpaid SG amounts.

Recommendation 7: SMC recommends that the Budget:

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[18] Senate Economics References Committee: Unlawful underpayment of employees' remuneration Government Response - Parliament of Australia (aph.gov.au), Recommendations 9 and 13, 6 April 2023
[19] Australian Government Treasury Ministers. Media Release: Introducing payday super. May 2023
[20] Australian National Audit Office (ANAO), Addressing Superannuation Guarantee Non-Compliance. April 2022
[21] Budget Measures 2023-24, Budget paper No. 2. Securing Australians' Superannuation Package – increasing the payment frequency of the Superannuation Guarantee (SG) and investing in SG compliance, p26. May 2023
[22] Portfolio Budget Statements 2023-24, Australian Tax Office Entity resources and planned performance. Program 1.14 – Superannuation Guarantee Scheme, p233. May 2023
[23] ATO corporate plan 2023-24. Chapter 11. Performance, Tables 21A and 21B, (Section 1.14 Superannuation Guarantee Scheme). July 2023
[24] ATO Annual Report 2022-23. Program 1.14 Superannuation Guarantee Scheme, p77-78. October 2023
[25] Mid-Year Economic and Fiscal Outlook 2023-24, p69. December 2023

- set targets for the Australian Taxation Office for the recovery of unpaid Superannuation Guarantee amounts in 2024-25 and subsequent years;
- identify specific superannuation contributions tax revenue amounts aligned with Australian Taxation Office targets for the recovery of unpaid Superannuation Guarantee amounts in 2024-25 and subsequent years; and
- provide the ATO with additional funding for it to be able to guarantee that it will be able to set and achieve performance targets for the recovery of unpaid Superannuation Guarantee amounts in 2024-25 and subsequent years.