



Thursday 9 September 2021

Mable's Submission:

Inquiry into Treasury Laws Amendment (2021 Measures No. 7) Bill 2021

Mable Technologies Pty Ltd

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We thank the Senate Economics Legislation Committee for their invitation to provide a submission to the Inquiry of the Treasury Laws Amendment (2021 Measures No. 7) Bill 2021.

Mable is a safeguarded online platform that enables aged care and disability consumers to discover, connect and build tailored support relationships with people (small businesses, including sole traders) in their local community. Since inception Mable has facilitated seven million hours of support and currently has around 11,000 approved and active support providers offering services via its platform.

The Mable platform was developed in response to two unmet demands in the marketplace:

1. The desire of aged care and disability support consumers to direct their own care, including engaging their own carers; and,
2. The desire of workers in the aged care and disability support sector to choose their clients as well as set their hours and conditions of work.

As well as being economically efficient and leading to increased levels of care, these principles enhance the dignity and quality of life of both clients and their support providers.

Mable is characterised as a horizontal platform¹ in that parties engage directly with each other to determine all aspects of their engagement - including the rates they charge and the services they offer and to whom - a model completely different to ride share or food delivery platforms. Mable does not insert itself to "set the market", allocate jobs or determine how and when services are provided. As such, Mable is not the provider of the service nor does Mable contract out delivery of services to the independent providers on its platform. Rather, Mable provides a technology, data and safeguards platform that supports the entry of small businesses into the care and support sector, and enables ongoing support relationships based on mutual choice.

At the same time, there are chronic workforce shortages in aged care and disability support. In this context, there is recognition that mixed models will be necessary to meet the support needs of National Disability Insurance Scheme participants and aged care at home consumers and respond to diverse support needs.

Mable's technology, data and safeguarding platform levels the playing field for small business providers to enter the sector by offering them:

- a marketing channel;
- a safeguarding framework;
- administrative support, including invoicing, payments and record keeping;
- the latest health and compliance information; and
- access to accredited training and professional development opportunities.

¹ The Victorian On-Demand Workforce inquiry referred to two distinct categories of platforms: "a crowd-work system" (referencing Airtasker, Upwork and Mable as examples) and "a work on-demand system" (referencing ridesharing and food delivery as examples).[ref Clause 77, page 15, Section 2.2.7] Similarly, in this same report, "The Australian Council of Trade Unions (ACTU) observes this distinction between platforms. Platforms operating in a horizontal fashion facilitate interactions between freelance providers; platforms operating in a vertical fashion, although presenting in a similar way, create a hierarchy between themselves and the worker". [ref See page 15, Section 2.3.7]



By enabling access to small business service providers (who have lower overheads and therefore often lower rates) and due to Mable's low fee structure, NDIS participants and Aged Care clients can pay substantially less than rates charged by some large traditional care organisations. As a result people can receive more hours of support and are able to pay their service providers more. Mable is also attracting a new and more diverse workforce in communities around Australia, and changing the perception of disability support, which in and of itself is increasing choice and control for people who need support to live independently.

We take this opportunity to provide Mable's views on the proposed amendments which have the most relevance to the operation of the Mable platform.

- Schedule 1 amendments to the Taxation Administration Act 1953
Improved reporting arrangements for transactions made through platforms

In regards to the proposed amendments, support providers are currently required to report their income as generated through the Mable platform in their capacity as a small business or sole trader providing a service.

As a safeguarded platform operator in regulated sectors, we understand the importance of transparency, record keeping and reporting obligations.

The Mable platform generates invoices and collects payment on the support provider's behalf, from the client's source of funds, such as via their nominated plan manager if they are an NDIS participant or from their Approved Home Care Provider if they have a Home Care Package. Consumers can also pay via direct debit and credit card. Monies are remitted to support providers daily for all invoice payments received the previous business day. Full records of invoices, payments and payment status is available to both support providers and clients via the Mable platform for them to report on appropriately.

Through the onboarding process for support providers we remind them of their obligations with regard to reporting income for the purposes of taxation. This includes informing them that if they are self-employed, they need to be aware of their reporting requirements and plan accordingly. For example in the Mable Help Centre we provide a range of advice and links to tools to assist support providers in terms of income tax calculators, as well as how Goods and Services Tax may apply to them depending on the service they provide, and how to apply for an Australian Business Number (ABN).

Accordingly, we are supportive of the intent of the Schedule 1 in so far as it further ensures ongoing transparency and compliance with those earning an income. Further we support information sharing where information held by Government agencies is kept secure in accordance with privacy law and the Australian Privacy Principles. We will continue to prepare for the mandatory reporting expected to commence for 2023 and welcome further clarity on how the reporting regime will operate for small businesses and platforms such as Mable to ensure there is a level playing field with a light touch regulatory approach, as highlighted by the 2019 Consultation Paper on a sharing economy reporting regime in response to the Black Economy Taskforce Final Report².

² <https://treasury.gov.au/consultation/c2018-t350194>

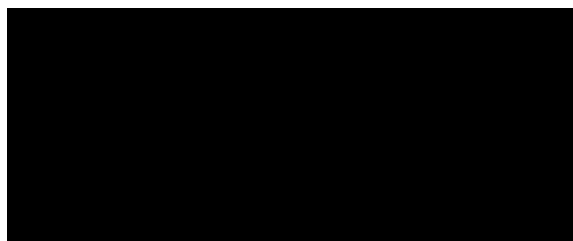


- Schedule 3 to the Bill
Removal of the \$250 work-related self-education expense threshold

We recognise the role that small businesses play in not just the Australian economy but also in responding to the chronic workforce shortages in the aged care and disability support and the need to attract and retain a skilled workforce. Small businesses are highly motivated to invest in professional development and skills acquisition. We welcome and support any move to reduce the cost of self-education and upskilling for employees and sole traders in order to grow their expertise and better support their clients and their businesses.

Mable is pioneering solutions in a complex sector which has significant future implications for millions of Australians, their families and the communities they live in.

We are open to an ongoing dialogue with the Committee if they require any further information.



Peter Scutt

Chief Executive Officer and Co-founder
Mable Technologies Pty Ltd