Treasury Laws Amendment (Improving Accountability and Member Outcomes in Superannuation Measures No. 2) Bill 2017

SCHEDULE 2 (SALARY SACRIFICE PROVISIONS)

29 September 2017

Industry Super Australia

ABOUT INDUSTRY SUPER AUSTRALIA

Industry Super Australia (ISA) is an umbrella organisation for the industry super movement. ISA manages collective projects on behalf of a number of Industry SuperFunds with the objective of maximising the retirement savings of five million industry super members. Please direct questions and comments to:

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TREASURY LAWS AMENDMENT (IMPROVING ACCOUNTABILITY AND MEMBER OUTCOMES IN SUPERANNUATION MEASURES NO. 2) BILL 2017

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Executive Summary

Industry super funds take their obligations to recover unpaid Superannuation Guarantee (SG) on behalf of their members seriously.

Industry super funds work hard to recover unpaid super on behalf of their members. Equally, Industry Super Australia (ISA) has been agitating for some time for changes to the law to reduce the serious problem of unpaid super in Australia.

In December 2016, ISA released a report with Cbus, *Overdue – Time for Action on Unpaid Super* (Overdue). *Overdue* estimated that 2.4 million Australians are being underpaid SG of at least $3.6 billion.

In March 2017, ISA lodged further analysis with the Senate Economics References Committee inquiry into non-payment of Superannuation Guarantee estimating, for 2013-14, 2.76 million people were underpaid SG in an aggregate amount of $5.6 billion.

Unpaid super is an important issue, and the proposed changes to salary sacrifice rules in the *Treasury Legislation Amendment (Improving Accountability and Member Outcomes in Superannuation Measures No. 2) Bill 2017* (Outcomes Bill No. 2) are welcomed.

Outcomes Bill No. 2 amends the *Superannuation Guarantee (Administration) Act 1992* to close the loophole that currently allows employers to use employees' voluntary salary sacrifice contributions to satisfy their SG obligations.

While closing the salary sacrifice loophole is a positive step, unfortunately the reforms fall a long way short of addressing the major causes of SG non-payment.

Of the billions in employer superannuation underpayments, ISA analysis indicates that only 16.4 percent is attributable to those who salary sacrifice.[1] In other words, the Bill's effort to close the salary sacrifice loopholes only addresses 16 percent of the problem.

The proposed salary sacrifice reform, then, is a small, but welcome step. More must be done.

ISA recommends that the Committee support the schedule addressing salary sacrifice subject to amending the bill to take stronger action on unpaid super (as outlined in Section 3.2 of this submission).

[1] Industry Super Australia submission to Treasury consultation on improving accountability and member outcomes in superannuation, 11 August 2017, 15.

1. Causes of Superannuation Guarantee non-payment in Australia

The causes of SG non-payment go far beyond salary sacrifice and include:

1. **Insufficient monitoring and lack of enforcement of SG non-payment**

The Australian Taxation Office (ATO) has significant compliance and enforcement responsibilities in respect of the superannuation system. In particular, it is responsible for monitoring non-compliance with SG obligations and addressing such non-compliance.

Historically, this function has not been sufficiently prioritised. As the Australian National Audit Office noted in its 2015 audit of the ATO, "the SG Scheme operates largely without the intervention of the ATO".[2] The ATO continues to monitor employer compliance with SG by testing whether overall employer contributions exceed the statutory percentage of salary and wages paid, rather than collecting ordinary time earnings (OTE) data.[3] The problem with this methodology is that it does not take into account employers who pay SG above legislated levels, while others make less than statutory or no contributions. Therefore, it does not provide a complete picture of SG compliance. Real time monitoring of the OTE base and super payment is required.

While the ATO's compliance and enforcement activities have centered on promoting voluntary compliance,[4] there is scope for it to draw on a wider pool of non-compliance information such as from external stakeholders rather than simply from its data matching model.[5] It is uncontroversial that some industries demonstrate less voluntary compliance with SG than others. As such it is of concern that the ATO has not previously sought non-compliance information from sources other than data matching. It makes sense that representatives of industries, such as unions and employer associations, would be able to offer the ATO relevant and detailed insight into the extent of SG non-payment in their industry.

2. **Insolvent employers**

Employer insolvency is a leading cause of non-payment of SG and yet limited steps have been taken to better monitor and enforce SG payment, such as through implementing real-time visibility of SG payment or legislating greater penalties for companies and directors who fail to meet their SG obligations. The use of phoenix companies to escape payment to creditors while remaining in business is one prominent way in which SG obligations are not met. Superannuation is more likely to be underpaid than wages in these circumstances, but it is not covered by the Commonwealth's Fair Entitlements Guarantee scheme.

3. **Gaps in super coverage**

The $450 per month contribution threshold creates a gap in super coverage and encourages underpayment. Originally introduced to accord with the $5,400 tax-free threshold for individuals in 1992-93 and out of concern for compliance costs for small businesses with part-time employees, in 2017 it is no longer relevant.

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[2] Australian National Audit Office, *Promoting compliance with Superannuation Guarantee obligations*, Performance Audit No 39 (2015) (ANAO Report), 14, 62.

[3] ANAO Report, 17.

[4] ANAO Report, section 3.

[5] ANAO Report, 104.

4. Contributions are not currently visible to employees and are not paid with pay cycles

Employer super contributions currently need only be paid quarterly and are not visible in real time. At best the Australian Tax Office (ATO) receives information on SG contributions for individuals once a year when superannuation funds lodge their annual member contributions statement. Employees must wait three months or longer to confirm that their super is being correctly paid, or indeed paid at all. The delay encourages employers to use employee super payments withheld to bolster cash flow, and then to underpay the quarterly super payment when it is due.

2. Extent of Superannuation Guarantee non-payment in Australia

2.1 ISA and ATO estimates

In March 2017, ISA created the most comprehensive analysis of the underpayment of employer superannuation contributions ever published.[6] ISA's analysis paints a damning picture of unpaid super in Australia.

ISA's analysis was considered at the Senate Economics References Committee hearing into the non-payment of SG earlier in 2017. At those hearings, the ATO criticised ISA's findings suggesting that the findings overestimated the extent of unpaid SG in Australia. The ATO was unable to provide its own alternative estimate and confirmed that it would be releasing its own estimate of the extent of the SG gap in Australia later in the year.

In late August 2017, the ATO released its estimate. ISA has since reviewed the ATO's estimate and has found that the estimate in fact confirms ISA's March 2017 estimate.

2.2 ISA's analysis

The ISA analysis is based on data from the ATO's 2 percent sample file for the 2013-14 financial year. This file is a 2 percent sample of individual income tax returns from that year. A sample size of 258,774 individuals out of a population of 12,964,285 made up of approximately 2 percent of the original records and of each sample subgroup (such as gender, age range, region and lodgment method) ensures an appropriately representative, but manageable sample size.

From the sample file, ISA estimated the total number of SG-eligible workers in Australia at 8,601,650. This estimate excludes self-employed wage and salary earners, wage earners under 18 years, and those likely to be below the $450 threshold. Although the ATO sample file does not allow the identification of defined benefit superannuation members who do not receive SG contributions from their employer, the numbers of defined benefit members in the data are about the same as the black economy workers which ISA was able to exclude from its March 2017 analysis. For this reason, ISA is confident that its calculations account for defined benefit members.

[6] Industry Super Australia supplementary submission to the Senate Economics Committee inquiry into superannuation guarantee non-payment, March 2017.

2.3 ISA's findings

2.76 million people received employer contributions, including salary sacrifice, of less than 8.5 percent of their estimated OTE in the 2013-14 financial year. In 2013-14, the legislated SG rate was 9.25 percent.

This represents 32 percent of SG eligible employees in Australia.

For each individual in the sample file, ISA calculated the percentage of SG paid by working out the ratio of employer contributions to OTE. Table 1 below shows that the cumulative number and percentage of individuals in the sample file being paid SG of up to 8.5 percent of their OTE was 32 percent, or 2,761,000 of the SG-eligible population.

Table 1 - Ratio of Employer Contributions to Ordinary Time Earnings

SG Population, including those without employer contributions 2013-14	Estimated Number SG Eligible	Cumulative Numbers	Cumulative Percentage
Employer Contributions to OTE Ratio			
Nil	610,850	610,850	7%
Over 0% and up to 5%	530,200	1,141,050	13%
5% up to 7%	586,950	1,728,000	20%
7% up to 8.0%	592,100	2,320,100	27%
8% up to 8.5%	440,900	2,761,000	32%
8.5% up to 9%	664,300	3,425,300	40%
9% up to 9.5%	1,541,650	4,966,950	58%
9.5% up to 10%	1,138,500	6,105,450	71%
10% up to 11%	751,450	6,856,900	80%
11% up to 15%	963,550	7,820,450	91%
15% and above	781,200	8,601,650	100%
All	8,601,650		

Source: ISA estimates from ATO 2 percent sample file of matched personal tax and superannuation records for 2013-14

Even taking a more conservative ratio of employer SG contributions to OTE of 7 percent, on this analysis still 1,728,000 (or 20 percent) people are being underpaid.

In a perfect world with employers fully complying with their SG obligations the cumulative percentage of individuals being paid up to 8.5 percent of their OTE would be zero or close to because everyone would be fully paid their SG entitlements. Put another way, very few individuals would present with a ratio of employer contributions to OTE of less than the legislated SG percentage in a given year.

The aggregate amount of SG underpaid was $5.6 billion, equating to $2,025 per person.

Table 2 below shows how, for employees receiving between 8 and 8.5 percent of their average weekly OTE alone, the aggregate gap in actual super received and super entitlement is $52 million. For all employees receiving 8.5 percent or less SG, the amount of underpayment was $5.6 billion.

Taking a conservative SG payment amount (actual SG paid as a percentage of OTE) of up to 8.5 percent allowed ISA to largely exclude the possibility of false positives (where the result suggests an individual is being underpaid SG but in fact they are not) and to allow for the increase in the SG rate from 9 to 9.25 percent in 2013-14.[7]

Table 2 - Employer Contributions Gap by Ratio of employer Contribution to OTE

Employer Contributions to OTE Ratio	Apparent Gap in Employer payments from 8.5% (AWOTE adjustment) including zero ($m)
Nil	$2,776
Over 0% and up to 5%	$1,686
5% up to 7%	$783
7% up to 8.0%	$294
8% up to 8.5%	$52
8.5% up to 9%	$0
9% up to 9.5%	$0
9.5% up to 10%	$0
10% up to 11%	$0
11% up to 15%	$0
15% and above	$0
All	$5,591

Source: ISA estimates from ATO 2 percent sample file of matched personal tax and superannuation records for 2013-14

$5.6 billion spread across the 2.761 million people who ISA estimates receive employer SG payments of 8.5 percent or less of their OTE results in an average of $2,025 underpaid SG per person in the 2013-14 financial year.

2.4 Differences in approach between ISA and ATO estimates

The ATO estimate of the SG Gap is an aggregate estimate based on total cash flows in the system. In this regard, it is a top-down approach that lacks the nuances afforded by distributional factors such as industry, gender or location of the individual taxpayer. On the other hand, ISA's estimate is a distributional estimate based on unit records for individual people drawn from the 2 percent sample file. ISA's analysis therefore

[7] By calculating the effective level of overtime for each gender, it was possible to select a rate at and below which SG was being underpaid. After this point, false positives, where an individual presents as not being paid SG but in fact is, became far less likely.

- For males, the OTE adjustment factor is 0.9468 (5.32%) and the use of an 8.5% cut-off will not give a false positive until overtime exceeds 11.95% of wages. The use of a 7.0% cut-off will not give a false positive until overtime exceeds 27.49% of wages.
- For females, the OTE adjustment factor is 0.9863 (1.37%) and the use of an 8.5% cut-off will not give a false positive until overtime exceeds 8.28% of wages. The use of a 7.0% cut-off will not give a false positive until overtime exceeds 24.46% of wages.

To determine the reasonableness of the 7 or 8.5 percent cut-off rates, it is necessary to consult the ABS 2017 Survey of Income and Housing. This shows that 7.5% of male full-time workers had paid overtime which was 12% or more of their total earnings in the reference week. On an annual basis the percentage with 11.95% or more paid overtime is likely less than half of this because overtime is shared around. Accordingly an 8.5% cut off may not be sufficient for around 3-4% of full-time male employees, but it is highly conservative for casual employees and part-time employees – most of whom are female. People working more than 25% of their hours as overtime are rare, so the 7% cut-off is extremely conservative.

reflects actual individual wages and salary and SG payments. It thus provides a more detailed picture than looking at the total payments across the board of wages and salary and of SG.

In the ATO's estimate, the contributions for people with generous employer contributions above the SG rate are combined with the contributions of people underpaid SG. The ATO have criticised ISA for not averaging the high and low contributions to be closer to their misleading estimates. However, taking an average of the high and low contributions in this context means that those workers receiving SG payments above the mandated 9.25 percent (as it then was) obscure those workers receiving payments below the mandated rate. The strength of the 2 percent sample is that it allows for an analysis of individual wage and salary payments and SG payments. In this way it therefore avoids the problems described with looking at the total wage and salary and SG payments across the data set, such as obscuring SG underpayment with those receiving above the mandated rate.

Ultimately, ISA's approach meant that it was able to produce analysis of underpayment by factors such as age and salary or broad occupation.[8]

[8] ISA supplementary submission to Senate Economics References Committee, March 2017, 5-6.

2.5 Re-examination of the ATO estimate

Phil Gallagher PSM of ISA has re-examined the ATO estimate in an effort reconcile it with the ISA estimate. He estimates that the total value of SG contributions paid in 2013-14, which were above a rate of 11% of ordinary time wages,[9] was $2.5 billion. Examining the total value of SG contributions above a rate of 11% of OTE reveals that there is a corresponding amount of SG underpayment that is *masked* by averaging out total SG contributions in the dataset. When this mask is removed, the true face of SG underpayment emerges.

What becomes clear is that the ATO estimate has negligible differences from ISA's – as demonstrated in Table 3.

Table 3 – Reconciliation of the ATO Estimate of the SG Gap with the ISA Estimate for 2013-14

Reconciliation of Published ATO SG GAP for 2013-14 with ISA Estimate		
Estimate	**$m**	**Source**
ATO Gross SG Gap	3,023	ATO
Value of Employer SG contributions above 11% of Ordinary Time Earnings	2,529	ISA Analysis of ATO Sample file
Total	**5,552**	
ISA Estimate March 2017	5,591	ISA Analysis of ATO Sample file
Difference	**39**	

The ATO's SG Gap estimate includes the black economy. ISA's estimate does not and could not exclude defined benefit members because of lack of information contained in the ATO's sample file to identify defined benefit members. The reconciliation implies that the black economy effects and the defined benefit effects are about the same size.

Clearly underpayment of super is a major problem. And salary sacrifice represents only a small part of the larger problem of SG non- or under-payment.

[9] The significance of 11% OTE is that after this point, the risk of false positive results (where a worker is in fact being paid SG but appears in the analysis not to be), tend to cease.

3. The bill does not address the major causes of Superannuation Guarantee underpayment

3.1 The Bill would close the salary sacrifice loophole, but this only addresses 16% of the unpaid super problem

In August 2017, ISA suggested that the government could better approach salary sacrifice and the associated problems of non-payment of SG in two ways: by preventing the SG base being reduced by an employee's sacrificed amounts, and by excluding sacrificed contributions from any "contribution" made by an employer on behalf of an employee. These two measures would address recommendations 8 and 9 of the Cross-Agency Working Group report on SG non-payment to close the salary sacrifice loophole.

The tabled bill addresses both of these recommendations.

First, consistent with ISA's suggestion in August 2017, the tabled bill prevents the SG base being reduced by an employee's sacrificed amounts. The bill defines sacrificed contributions as sacrificed ordinary time earnings contribution and sacrificed salary and wages contribution in sections 15A(1) and (2). This is significant because it means that an employee's sacrificed contributions are now legally distinct from the definition of "contribution" in section 23, which covers contributions made by an employer on behalf of an employee to their superannuation fund or retirement savings account.

The bill also amends the definition of quarterly OTE base and quarterly salary and wages base to clarify that sacrificed contributions are included in the quarterly base. Previously, sacrificed salary and wages or sacrificed OTE contributions were not included in an employee's quarterly salary and wage or OTE base. This meant that sacrificed contributions could be counted as reducing an employer's superannuation guarantee shortfall because they were not included in an employee's quarterly base.

Further, the tabled bill specifically excludes sacrificed contributions from the definition of "contribution" in section 23. At present, an employer can reduce its superannuation guarantee charge by contributing for the benefit of an employee to a complying superannuation fund. "Contribution" is defined as "the number of dollars in the amount of the contribution". The bill rectifies this issue by omitting "contributes" and substituting "makes a contribution (other than a sacrificed contribution)". Therefore, even though an employer makes a salary sacrifice contribution on behalf of an employee, the salary sacrifice contribution amount cannot be counted as part of an employer's contribution to reduce the employer's SG charge.

The tabled bill squarely addresses one problem, where employers can reduce their SG liability by counting employees' salary sacrificed amounts.

Yet this problem only contributes to a small percentage of unpaid super in Australia.

Of the 2.7 million people with total employer contributions less than 8.5% of ordinary time earnings, only 216,000 people who were salary-sacrificing were underpaid. An additional 213,000 people with salary sacrifice contributions were underpaid SG, but were not underpaid in terms of total employer contributions including their salary sacrifice contributions. Less than 16 per cent of employer superannuation underpayment is for people who salary sacrifice.

Of the $5.59 billion in employer superannuation underpayments, only $0.92 billion is for people who salary sacrifice (16.4%).

3.2 How to more comprehensively address the unpaid super problem

Parliament can do more than address only 16% of the unpaid super problem. To comprehensively ensure the Superannuation Guarantee is honoured, policy makers should:

1. **Insist the ATO to overhaul its compliance risk regime to better target auditing and monitoring of SG compliance**

Instead of assessing SG compliance by testing total SG paid against total salary and wages paid, the ATO must develop a more sophisticated matched file. This would better target auditing and compliance monitoring by combining Member Contributions Statements (MCS), division 293 and personal tax data. Using this data, the ATO could report to parliament on the ratio of employer contributions to imputed OTE. The ATO would therefore have individual OTE data, which would be more accurate for SG non-payment purposes than the current approach.

The effectiveness of the ATO's enforcement actions around unpaid SG could also be improved by aligning its SG compliance activities with its other compliance activities. Not only would this better streamline the ATO's compliance activities, it would enable the ATO to conduct better and more effective proactive audits of SG compliance. This would assist the ATO to respond more quickly in situations where time is of the essence, such as in cases of insolvent employers.

2. **Amend the *Taxation Administration Act 1953* to include mandatory OTE reporting in the ATO's new single touch payroll (STP) system**

This would make OTE, overtime, wages and SG paid visible to the ATO, the Fair Work Commission and employees in a timely and detailed manner. Significantly, this would further address the ATO's current problems accurately assessing compliance with SG obligations because it would have access to OTE rather than aggregate salary and wages. Access to relevant data in this way would not only greatly aid the ATO's surveillance activities, it would also assist short lag compliance activity.

If policy makers are not minded to make OTE reporting mandatory in STP, it should at least change the SG base to Salary and Wages rather than OTE.

Salary and Wages is a more reliable indicator of non-payment of SG than OTE, as well as being more readily and reliably measurable.

3. **Include employers with 19 or fewer employees in STP without exception from 1 July 2019**

Smaller employers are a major group not complying with SG, so it makes sense to include smaller businesses in STP to promote greater compliance. On 29 August 2017, the Minister for Revenue and Financial Services suggested that the Turnbull Government would be backing workers on superannuation by bringing payroll reporting into the 21st century including requiring employers with fewer than 20 employees to transition to STP by 1 July 2019.[10] However no amending legislation has been introduced to effect this change and billions in unpaid super will be lost if this is not legislated more urgently. The Parliament should act immediately and amend to include small businesses in STP by 1 July 2018.

The STP regime is set out in Division 389 of Schedule 1 of the Taxation Administration Act. Currently, the provisions require only "substantial employers" to provide the relevant reports (s 389-5(1)). An employer is defined as a "substantial employer" if it has 20 or more individuals who were employees (s 389-5(6)). To extend the regime to *all* employers, references to "substantial employer" in Division 389 should be replaced with references to "employer".

[10] The Hon Kelly O'Dwyer MP Minister for Revenue and Financial Services, media release 29 August 2017, Turnbull Government backs workers on superannuation, .

4. Require SG to be paid at the same time as wages and salary

There is evidence to suggest that the current requirement to pay SG quarterly is sometimes used by employers to bolster cash flow. Likewise, many accountants agree that inability to meet SG obligations is one of the first signs that a business is having cash flow problems or heading towards insolvency.[11] Using the quarterly requirement to bolster cash flow creates the real possibility of under or non-payment of SG when the time comes for payment. Whilst the quarterly regime may have been appropriate when manual payroll systems were more common almost every payroll software system used by small and large employers today enables (or could be easily enabled) to pay superannuation at every payroll cycle.

5. Remove the $450 per month wages threshold for SG payment

The original purpose of the threshold was to accord with the annual tax-free threshold in 1992-93 of $5,400, in order to encourage part time or casual employees to make contributions to their super.

These concerns are now addressed by the LISTO, the $18,200 personal tax threshold, and modern accounting systems. The $450 threshold is now a compliance cost for business and may also lead to non-payment of superannuation, whether intentionally or inadvertently.

Removing the threshold would reduce the compliance burden on business, because there would be no necessity to calculate the threshold for each employee based on their monthly earnings; there would be one rule for all employees.

It would also allow more SG to flow to those workers who most need it such as low income and casual workers, many of whom may already be struggling financially, and may be more likely to rely on the Age Pension in the future. For example, women are disproportionately represented in part-time and casual work and are therefore more likely to be subject to the $450 threshold. Women are also more likely to rely on the Age Pension.[12]

As the Senate Economics References Committee noted earlier this year, the increasing casualisation of the Australian workforce will only further contribute to the adverse impacts of the threshold on affected workers.[13]

6. Let third parties assist employees to obtain their unpaid super

Allowing third parties such as unions or superannuation funds to commence legal proceedings on behalf of aggrieved employees for unpaid SG could reduce the burden on the government's Fair Entitlements Guarantee to pursue employers in certain circumstances.

This could be achieved through permitting the ATO to delegate an agent (such as a fund or service provider to them) to recover unpaid SG on application.

7. Lower incentives for employers to use insolvency as a way of avoiding SG obligations by closing the gaps in the Fair Entitlements Guarantee scheme

The Government has also announced its intention to introduce Director Identification Numbers as part of

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[11] Industry Super Australia supplementary submission to the Senate Economics References Committee inquiry into superannuation guarantee non-payment, March 2017, 21; submissions 3, 8 and 25 to Senate Economics References Committee inquiry into superannuation guarantee non-payment.

[12] In 2013, 55.6 percent of Age Pension recipients were women while 44.4 percent were men. Of these recipients, 60.8 percent of women were dependant on the full rate in comparison to 57 percent of men.

Department of Social Services" Statistical Paper No. 12, Income support customers: a statistical overview 2013 – Table 4 'Age Pension recipients, characteristics by sex, June 2013'.

[13] Senate Economics References Committee report, Superbad – Wage theft and non-compliance of the Superannuation Guarantee, May 2017, 33, [5.25].

reforms in its response to sharp business practices and phoenixing.[14] This is a positive step, however there are many further, and more impactful, measures that the Government could take to reduce the effects of sharp business practices and phoenixing.

For example, the law should be changed to enhance and extend information sharing between the ATO, the Fair Work Ombudsman and ASIC about businesses at risk of insolvency or phoenix activities. This would empower the relevant authorities to take proactive steps to protect employee SG entitlements.

Sections 433, 556 and 561 of the *Corporations Act* should be amended for employee entitlements to be recovered with priority from insolvent trustee companies.

The employee entitlements offence provisions (sections 596AB and 596AC) in the *Corporations Act* should be reformed to give ASIC standing to prosecute, and employees standing to commence civil proceedings against companies engaging in phoenix activities.

Sections 588G and 588V of the *Corporations Act* should be amended to allow the corporate veil to be pierced in certain circumstances to facilitate the recovery of employee entitlements from the employer company's directors and related entities. The Government has announced reforms to make directors personally liable for GST liabilities,[15] it should simply extend the director penalty provisions to include the potential recovery of employee entitlements.

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[14] The Hon Kelly O'Dwyer, Minister for Revenue and Financial Services, media release 12 September 2017, http://kmo.ministers.treasury.gov.au/media-release/090-2017/.

[15] The Hon Kelly O'Dwyer MP, Minister for Revenue and Financial Services, media release 12 September 2017, http://kmo.ministers.treasury.gov.au/media-release/090-2017/.