



14 February 2020

The Committee Secretary
Senate Standing Committee on Economics
economics@sen@aph.gov.au

Dear Sir or Madam

Unlawful underpayment of employees' remuneration

We welcome the opportunity to provide a submission to Economics References Committee on the terms of reference relating to unlawful underpayment of employees' remuneration. Appendix A provides our detailed submission and Appendix B provides more information about Chartered Accountants Australia and New Zealand (CA ANZ).

Key Points:

- We consider it important to distinguish between underpayments made deliberately (with intent), the mis-classification of employees as contractors (sham-contractors) and those underpayments made due to error as a result of an overly complex system.
- Some of our members have expressed their frustration with the frequency and complexity of changes to modern awards in Australia, which can result in confusion and errors.
- Sham contracting has become the norm in some industries and we believe increasing transparency about this practice can assist regulatory authorities tackle this issue.
- We suggest the Committee considers a primary focus on changing behaviour and improving organisational culture in relation to employee remuneration by focusing on both appropriate incentives and deterrents as well as encouraging the Fair Work Ombudsman to work more collaboratively with businesses.
- The recent introduction of Single Touch Payroll and its expected expansion may help incentivise renewed interest in achieving greater alignment across employment laws. The expansion could also include information on employee awards, which would provide a data point for the Fair Work Ombudsman (FWO).

Should you have any questions about the matters discussed in this submission or wish to discuss them further, please contact Karen McWilliams via email at

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Yours sincerely

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Appendix A

General comments

The unlawful underpayment of employees' remuneration can arise in different situations. In some situations, it is the classification of a person as a contractor rather than an employee – this is often a systemic industry issue. In others, it is the deliberate under payment of wages ('wage theft') and can relate to black economy activity. It can also be the accidental or mistaken underpayment of wages.

The motivations, and thus the solutions, to these different types of underpayment of employee remuneration are different. As the Black Economy Taskforce (BET) noted, the "effective behavioural interventions must focus on both incentives and deterrents, be appropriate to the spectrum of behaviours we see (as opposed to one-size-fits-all) and not have perverse results (like driving more people into the black economy)."¹

A consequence of the complexity and lack of integration of the industrial awards systems combined with the various tax and other regulatory systems associated with employment is that many employers fail. Many employers trying to do the right thing by employees fail not due to intent or negligence but due to complexity. There is no national, consistent "bright line" test for the employee – contractor distinction for example. Recent media reports have shown that this is true for both large multinational companies as well as small businesses.

Complexity of Modern Awards

Some of our members have expressed their frustration with the number and complexity of modern awards in Australia. We recognise that the Australian Industrial Relations Commission (now known as Fair Work Commission) did a great job in reducing some of the inconsistencies of awards by replacing the 1,560 state awards with 122 modern awards. However, issues still exist which impact the application of awards such as:

- Conflicts between legislation, in particular relating to superannuation. For example, under the Superannuation Guarantee (SG), a contribution of 9.5% of an employee's ordinary time earnings is paid for adult employees who have earned more than \$450 in any calendar month. However, under the Restaurant Industry Award 2010 (RIA), employers pay superannuation when an employee earns \$350 or more in a calendar month.
- The legalistic language used in the modern awards has been difficult to interpret. However, we note the Fair Work Commission (FWC) continues to review and release new versions of all modern awards, which for most awards includes changes in layout and language used with an aim for the modern awards to be simpler and easier to understand.
- Whilst, we support the FWC's work to update awards, our members have expressed concerns that continued changes to the awards throughout the year may result in timing delays in payroll and accounting systems (Award interpreting systems). There is also the potential that some changes may be missed, or undetected, especially for businesses that may rely on (and assume that) software providers to make awards changes in payroll and accounting systems. We note that there are no approximate time frames for the release of the new versions of tranches 2 and 3 awards. Transparency of the time frames for these revisions and allowing adequate time for implementation will assist businesses to prepare for anticipated changes.

¹ Page 145 of the final report of the Black Economy Taskforce.

- Insufficient descriptions given to the classification of a role within an award. For example, under the RIA a B.3.6 Cook grade 3 (tradesperson) is 'a commi chef or equivalent who has completed an apprenticeship or who has passed the appropriate trade test or who has the appropriate level of training'. However, the award does not outline what an appropriate level of appropriate training is to satisfy this classification, which may lead to variations in interpretation when applying the award.
- The variations in penalty rates across different levels within an award and across awards create complexity. This complexity is further increased when accounting for an individual employee who may be required to work at different levels across different days. Take for example the situation of a worker employed under the RIA as a Cook grade 3 (tradesperson), but then fills in on Friday as a Cook grade 4 (tradesperson) and a Cook grade 5 (tradesperson) on the weekend. This employee would therefore have 3 different rates to be applied across the different grades, as well as any relevant penalties that may apply (for working weekends and/or public holidays).
- Public holiday penalties that must also consider any state specific peculiarities that impact the application of an awards, in particular the inconsistencies of public holidays across the states and the various regional or show days. For example, the Christmas Eve Public Holiday applies to QLD (6pm to midnight), NT (7pm to midnight) and SA (7pm to midnight) but is not applied in other states or territories.

In addition to the modern award complexities highlighted above, we also note the conflicts in some statutory provisions as they relate to superannuation. For example, the SG is generally not payable for an employee who works overtime but is applicable if the employee is paid a shift loading. Further, there are inconsistencies in the application of the Superannuation Guarantee to workers compensation payments between the modern awards and the ATO's ruling on what constitutes ordinary time earnings under the SG legislation. It is also important to note that the superannuation laws, and related tax laws such as Fringe Benefits Tax, are very complex and contain inconsistent definitions.

Process, people and technology

All businesses experience payroll and employee remuneration challenges, regardless of size. In Australia, small business (defined as businesses with less than 20 employees) accounts for 97.7% of all Australian businesses and employs 44% of Australia's workforce.² Small businesses experience the same challenges (as noted above) as large businesses when applying awards with the added pressure of limited resourcing which may include cashflow, staffing and technology.

We note that in smaller operations, the payroll function may be carried out by an internal employee or outsourced to a bookkeeper, neither of whom may be adequately qualified to understand (and therefore look out for) the changes in employee remuneration (awards, penalties etc) requirements. In some sectors, small businesses rely heavily on their industry association for guidance.³

With the growth in use of technology within business, there has also been an increasing reliance on systems and software to automatically factor in awards and changes to them. Some of our members have noted that due to the complexities that still exist within the modern awards, many payroll systems being used do not actually have the capacity to keep up with the different variants that may be applicable to today's workforce (such as casual leave provisions, part time sick leave adjustments, overtime provisions for casuals, different work weeks and working hours etc). This often results in manual calculations being performed, which are more susceptible to error. Additionally, often no checks are made at an individual

² *Small Business Counts* - The Australian Small Business and Family Enterprise Ombudsman (ASBFEO) July 2019

³ For example, the services offered by Restaurant & Catering Industrial to members of Restaurant & Catering Australia. Refer: <http://rca.asn.au/rca/what-we-do/workplace-relations-advisory-service/>

employee level. Rather, they are generally performed on a total basis. The introduction of Single Touch Payroll, discussed below, has helped increase employers' focus on payroll, which will help in the identification of issues.

Single Touch Payroll

CA ANZ, along with many other organisations, have long called for greater alignment of definitions of "employee" across employment laws to make compliance easier. There have been numerous government discussion groups that have attempted to do so, but this goal has proved elusive so far.

The recent introduction of Single Touch Payroll and its expected expansion may help incentivise renewed interest in the achievement of the goal of greater alignment. As further data sets are added to the software (e.g. hours worked information) and enhancements based on artificial intelligence occur, this platform may one day develop functions which help address underpayment of worker entitlements. Currently however, "Stage 1" Single Touch Payroll implementation involves simplifying tax and superannuation reporting obligations for employers, providing real time payroll information to the Australian Tax Office (ATO) (via accounting software) and eliminating the need for employers to report employee-related Pay As You Go Withholding (PAYGW) in their activity statements throughout the year and employee payment summaries at the end of the year. Stage 1 PAYGW and superannuation liability information is matched to information within the ATO systems.

There is draft legislation, that is subject to consultation, which proposes to expand this reporting to include voluntary disclosure of employer withholding of child support deductions from salary and wages and child support garnishees. It would make sense for Single Touch Payroll to be gradually extended to include State-based payroll tax and workers' compensation insurance information to assist in the minimisation of regulatory reporting by employers. Coverage of Fringe Benefits Tax (FBT) would also be helpful given that reporting of an employee's total remuneration is relevant in a number of contexts. We consider it would also make sense for Single Touch Payroll to include information about which award applied to the employee. This would provide a data point from which regulators, such as the FWO, could more easily check if entitlements were being met without needing to intrude in a more time-consuming way on those who operate the business.

Employee awareness and obligations

Although payroll compliance is ultimately the responsibility of the employer organisation, it is important that employees are also aware of their entitlements, including superannuation. However, we acknowledge that the complexity of awards is an issue for employees as well. The non-payment of salary and wages will have an immediate impact on an employee's living standard and for this reason most employees will chase up an employer who has not paid by the due date. However, very few employees check that an employer has made any compulsory or voluntary superannuation contributions by the due date. Often any errors are only determined many years after non-compliance first occurred.

We suggest the committee considers ongoing education of employees (as well as employers) of their entitlements and avenues of support that maybe available, this may include FWO encouraging businesses to improve awareness within their own organisations. Single Touch Payroll now provides real time data to employees about PAYGW deductions and superannuation through their MyGov account. The ATO also check that superannuation payable matches the superannuation paid.

More radical solutions have been proffered over the years. The Committee will no doubt hear from the Council of Small Business Australia (COSBOA) which for many years has advocated for employers to be

removed from the superannuation collection process altogether, and for superannuation to be included in PAYE payments made to the ATO by employers.⁴

Responses to Terms of Reference

a. The forms of and reasons for wage theft and whether it is regarded by some businesses as 'a cost of doing business'

As noted above, we consider it important to distinguish between underpayments made deliberately (with intent), the mis-classification of employees as contractors (sham contractors) and those underpayments made due to error as a result of an over complex system.

The BET noted that "the exploitation of vulnerable workers is widespread and may be growing."⁵ The exploitation of vulnerable workers is concerning not only for the vulnerable worker themselves, but also honest businesses and their employees that are being undercut by competitors who are not doing the right thing. The BET also noted "low compliance with Fair Work laws is often accompanied by non-compliance with other obligations including PAYGW, payroll tax and visas."⁶

Sham contracting

Sham contracting has become the norm in some industries. Increasing transparency about this practice can assist regulatory authorities tackle this issue. Information about contract payments made in some of those industries is available to the ATO through the taxable payments reporting system (TPRS). Under the TPRS, businesses in the building industry have, since 2012, reported payments that they make to contractors. As a result of recommendation 6.1 of the BET report, TPRS has recently been extended to cleaning, couriers, road freight, information technology services, security, investigation or surveillance services.

Revenue collections since the introduction of the TPRS in the building and construction industry have continually increased. Whilst this may not be perceived to be of an immediate benefit to the worker, it does have the effect of reducing the incentive to participate in sham contracting arrangements by increasing the costs of participation.⁷ Another existing tax measure that has the potential effect of reducing the benefits of sham contracting is the alienation of personal services income (PSI) rules. These rules are intended to improve the integrity of and equity in the tax system by ensuring that income tax is not reduced or deferred by diverting personal services income through companies, partnerships or trusts. Unfortunately, these rules are not fully effective. A 2009 Board of Taxation report, the Henry Report and the BET have all called for these rules to be reviewed with a view to improving their effectiveness. We consider it time this is done.

For sham contracting to work, the employee/contractor needs to be able to provide an Australian Business Number (ABN).⁸ Indeed, the expression "No ABN, no job" is still often heard in some industries. It is noted that recommendations 4.2 and 10.2 of the BET concerned improving the integrity of the ABN systems⁹ and requiring taxpayers as part of the ABN application process to

⁴ See for example COSBOA's submission to the Royal Commission into Misconduct in the Banking, Superannuation and Financial Services Industry: <https://www.cosboa.org.au/post/2018/05/29/banking-royal-commission-cosboa-may-submission>

⁵ Page 3 of the final report of the Black Economy Taskforce.

⁶ Page 135 of the final report of the Black Economy Taskforce.

⁷ <https://www.ato.gov.au/About-ATO/Commitments-and-reporting/In-detail/Taxable-payments-reporting-system/Taxable-payments-reporting-system---effectiveness/>

⁸ The ABN implies legitimacy and regulatory compliance

⁹ The BET recommended the following changes:

- Require provision of tax file number (TFN)
- Remove entitlement from specific groups – e.g. people on a tourist visa (apprentices).
- Periodic renewal that is conditional upon having met key tax obligations and not associated with a phoenix operation.
- More timely cancellations

indicate that they are an independent contractor. The BET also recommended that the ATO should subsequently scrutinise a sample of cases where taxpayers self-assess against the results test and unrelated clients test. The government agreed with these recommendations and undertook to consult on them.¹⁰ With detailed consultations beginning on the modernisation of business registers (which includes the ABN) it is expected that these issues will also be considered.

We also suggest that the Committee consider the extent of underpayment of working holidaymakers and seasonal workers who relocate to Australia temporarily (e.g. from Pacific island nations). This group may be especially susceptible to underpayment practices as part of tax arbitrage arrangements.¹¹

b. The cost of wage and superannuation theft to the national economy

No comment.

c. The best means of identifying and uncovering wage and superannuation theft, including ensuring that those exposing wage/superannuation theft are adequately protected from adverse treatment

Refer to our comments above regarding the potential future functionality of Single Touch Payroll. As earlier noted, it is necessary to distinguish between accidental and deliberate underpayment of wages.

Accidental underpayment

It is important for the Committee to recognise that often the businesses that have self-reported also identified the issues and underpayment themselves but may have experienced negative consequences for doing so. It is important for FWO to continue to encourage self-reporting by organisations, including working collaboratively with business to identify and rectify issues without fear of negative consequences. We suggest the Committee considers a focus on changing behaviour and improving organisational culture in relation to employee remuneration which includes encouraging the Fair Work Ombudsman to work more collaboratively with businesses.

Deliberate underpayment

However, people who deliberately underpay wages are not going to be compliant with a largely voluntary reporting system. Such people need to be detected and have financial incentives associated with such behaviour eliminated. In this context, we note that the current tax rules allow the ATO to take action directly against employers and the directors or companies. ASIC actively assists employees gain access to the Fair Entitlements Guarantee scheme (FEG) by exercising its wind-up powers and appointing liquidators to abandoned companies, and can seek recompense from employers for FEG payouts.

Reducing financial incentives

Recommendation 7.5 of the Black Economy Taskforce, which the government has already legislated, denies businesses tax deductions for payments made to employees and contractors if they did not

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- Better data matching to pre-fill tax returns
 - Consider having an ABN renewal fee

¹⁰ The 'tidying up' of the ABN registry has already commenced. The BET final report in 2017 noted that "The ATO has cancelled over 2 million ABNs over the last three years because individuals either did not lodge a tax return or activity statements at any point over the last 2 years despite being required to do so; or they lodged but recorded no business or personal services income."

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¹¹ Working holidaymakers are meant to have tax withheld at 15% on the first \$37,000 of income, although the tax impost is currently under a cloud for some tax treaty countries as a result of the decision in [Addy v Commissioner of Taxation](#).

comply with the pay-as-you-go reporting and withholding requirements unless they make a voluntary disclosure before compliance activity commences or have reasonable grounds for adopting the incorrect treatment. The aim of this provisions is to “create a financial disincentive to operating in the black economy by disallowing deductibility for payments to employees and contractors which are not properly reported.”¹² It is too early to determine the impact of this measure, but its existence means that the benefits of underpaying wages are reduced if you are detected.

It is noted that as part of its response to the Migrant Workers Taskforce, the government agreed to increase penalties tenfold, create criminal sanctions, introduce additional resources and strengthen investigative powers for the FWO.¹³

Increasing detection

Detecting such behaviour is hard as the perpetrators generally operate in the hidden economy. This was recognised by the BET which recommended the government “implement a multi-prong strategy to increase the level and visibility of enforcement and prosecution covering tax, industrial relations, welfare, immigration and financial regulatory compliance”.¹⁴ The government agreed to this and has increased funding for the ATO. In the 2016-17 Budget, the ATO received \$679m over four years to establish and run the tax avoidance taskforce. A recent Australian National Audit Office report noted that revenue raised by the ATO had increased significantly since the commencement of the taskforce.

Other initiatives to help increase detection include:

- Ensuring that the FWO is adequately resourced⁷ - this is a result of the acceptance by the Government of a recommendation by the Migrant Workers Taskforce.
- The ATO’s establishment of a black economy hotline in July 2019 which has received over 15,000 calls in the first three months (over 230 a day).¹⁵ According to an ATO media statement¹⁶, a significant number of these calls related to worker entitlements.
- Phoenixing taskforce - illegal phoenix activity is a commonly used way for some in the community to avoid payment of employee entitlements. To overcome inter-governmental data sharing difficulties a Phoenix Taskforce was established in 2014. The Taskforce comprises 13 Commonwealth and 21 state and territory entities. In 2017 the Phoenix Taskforce steering committee developed a law reform programme.
- The Treasury Laws Amendment (Combating Illegal Phoenixing) Bill 2019, passed on 5 February 2020, introduces measures to reduce the incidence of illegal phoenixing activity and therefore its effect on employees.

¹² Page 168 of the final report of the Black Economy Taskforce

¹³ <https://www.ag.gov.au/industrial-relations/industrial-relations-publications/Pages/government-response-migrant-workers-taskforce-report.aspx>

¹⁴ Recommendation 8.1

¹⁵ <https://www.ato.gov.au/Media-centre/Media-releases/ATO-receives-230-tip-offs-per-day-as-focus-on-the-black-economy-continues/>

¹⁶ <https://www.ato.gov.au/Media-centre/Media-releases/ATO-receives-230-tip-offs-per-day-as-focus-on-the-black-economy-continues/>

d. The taxation treatment of people whose stolen wages are later repaid to them

The receipt of a large lump sum back payment of wages could push a taxpayer into a higher tax bracket and result in them paying more tax than if they had received the back pay at the time that they should have. An income tax rebate¹⁷ is available to mitigate this unfair treatment for income tax. However, a recent AAT case¹⁸ has revealed deficiencies in the legislation in that it does not provide similar relief in relation to the Medicare levy when the Medicare levy did not apply to the taxpayer in the years that the back pay relates to.¹⁹ The AAT senior member who heard the case stated that this case focuses “attention on whether the Parliament should legislate for a provision which would allow the Commissioner of Taxation to exercise a discretion in favour of taxpayers where the taxation legislation operates in an anomalous or unintended manner, as it does here”. Exploration of whether the Commissioner’s existing discretion can resolve this issue or whether a legislative fix is needed should be undertaken.

A similar problem arises for large catch-up super contributions. The income tax laws permit the ATO to deem such contributions not to be excess concessional contributions but only if an individual applies for this concession. The ATO does not have a similar power to exclude such contributions from being subject to the Division 293 higher income earners contribution tax rate (that is, 30% as opposed to 15%).

e. Whether extension of liability and supply chain measures should be introduced to drive improved compliance with wage and superannuation-relation laws

In Australia there are already measures which aim to drive improved compliance through the supply chain. In particular, the Fair Work Act already includes provisions that extend liability to others within the supply chain such as the franchisor or holding company and also to others who were ‘involved’ in the employers contravention.

Further additional measures include the Modern Slavery Act 2018 which requires organisations with at least \$100m in consolidated revenue to assess their supply chains and produce an annual modern slavery statement based on the outcome of this assessment and Payment Times Reporting Framework (currently being finalised). We suggest the Committee allows time for the impact of these new measures on supply chains to be observed before considering additional measures.

f. The most effective means of recovering unpaid entitlements and deterring wage and superannuation theft, including changes to the existing legal framework that would assist with recover and deterrence.

As our submission has highlighted, the response to deterring wage and superannuation theft needs to distinguish between intentional and unintentional underpayments. Our submission also includes suggested means to deter and prevent underpayment of wages and superannuation.

Additionally, we recommend the SG penalties need to be softened when an employer does not contribute by the legislated due dates. There can be no denying that deliberate non-payment of SG

¹⁷ Subdivision AB of Division 17 ([ss.159ZR – 159ZRD](#)) of the [Income Tax Assessment Act 1936](#) (the ITAA 1936).

¹⁸ [Biswas and Commissioner of Taxation](#) (Taxation) [2019] AATA 2372 (5 August 2019)

¹⁹ The rebate was probably not extended to include the Medicare levy as the Medicare levy is generally imposed at the same rate regardless of your income level. But this case highlighted the issue the Medicare levy is not always payable (e.g. non-residents or certain low income taxpayers) and in this case was payable in the year of wage receipt but not the year that the wage sum was earned.

contributions is effectively wages theft including when an employer fails to apply their absolute best endeavors to satisfying all requirements of their payroll function. But regrettably, employers sometimes find themselves in very difficult circumstances – severe bushfires, cyclones, floods, droughts and other events beyond everyone’s control – which impact their ability to meet ordinary liabilities. Businesses need some leeway to help them do the right thing while they get their feet back on the ground after these unforeseeable events. This should not be a freely available concession but would only be accessed with ATO approval. The concession should allow an employer to make good SG non-payment in a timely and fair manner for all concerned in the wake of a “force majeure” type situation.

g. Whether Federal Government procurement practices can be modified to ensure that public contracts are only awarded to those businesses that do not engage in wage and superannuation theft

CA ANZ notes that businesses and their first-tier subcontractors tendering for Commonwealth Government contracts over \$4 million, including goods and services tax (GST), must obtain a statement of tax record (STR) showing satisfactory engagement with the tax system. Lodgment of tax forms and payment of outstanding tax debts are factors considered by the ATO in determining whether to issue an STR. The Committee should discuss with the ATO the extent to which the STR program adequately addresses non-payment of employment-related tax liabilities and consider whether the “social licence” thinking behind the STR should be extended to other agencies, such as the FWO.

h. Other related matters

Businesses collaborating with FWO

Our members have shared their experiences and often frustrations when dealing with the FWO. In particular, the inability for the FWO to provide advice or confirmation of Awards, including in areas where the legislation is unclear or contradictory. Some of our members have also noted that it can sometimes be difficult to pro-actively work through and resolve issues with FWO. This has resulted in businesses being hesitant to raise issues with FWO when they are discovered.

We suggest the committee considers how it can encourage the FWO to adopt a different approach to encourage businesses to work together with the FWO early in the process when issues are identified. We note a popular transformation amongst our members has been the ATO and their focus on the customer experience. Many of our members have praised the ATO for its change of attitude, its more proactive approach in encouraging businesses to engage with them early to find solutions and the ATO’s ability to speedily issue private rulings on “grey” areas of the law.

Accountability for systems and processes

Stronger requirements and accountability for systems and processes would help not only detect wage payment issues, but also serve to prevent them occurring in the first place. We recommend that the onus for maintaining effective systems should lie with management and boards, and that assurance as to the operating effectiveness of controls undertaken by auditors would serve to further strengthen the lines of defence against wage payment issues. A framework for systems and internal controls related to wage payment, and assurance, proportionately applied to entities based on their economic significance and number of employees would be an important underpinning for this type of approach.

Appendix B

About Chartered Accountants Australia and New Zealand

Chartered Accountants Australia and New Zealand (CA ANZ) represents more than 125,000 financial professionals, supporting them to build value and make a difference to the businesses, organisations and communities in which they work and live.

Around the world, Chartered Accountants are known for their integrity, financial skills, adaptability and the rigour of their professional education and training.

CA ANZ promotes the Chartered Accountant (CA) designation and high ethical standards, delivers world-class services and life-long education to members and advocates for the public good. We protect the reputation of the designation by ensuring members continue to comply with a code of ethics, backed by a robust discipline process. We also monitor Chartered Accountants who offer services directly to the public.

Our flagship CA Program, the pathway to becoming a Chartered Accountant, combines rigorous education with practical experience. Ongoing professional development helps members shape business decisions and remain relevant in a changing world.

We actively engage with governments, regulators and standard-setters on behalf of members and the profession to advocate in the public interest. Our thought leadership promotes prosperity in Australia and New Zealand.

Our support of the profession extends to affiliations with international accounting organisations.

We are a member of the International Federation of Accountants and are connected globally through Chartered Accountants Worldwide and the Global Accounting Alliance. Chartered Accountants Worldwide brings together members of 13 chartered accounting institutes to create a community of more than 1.8 million Chartered Accountants and students in more than 190 countries. CA ANZ is a founding member of the Global Accounting Alliance which is made up of 10 leading accounting bodies that together promote quality services, share information and collaborate on important international issues.

We also have a strategic alliance with the Association of Chartered Certified Accountants. The alliance represents more than 870,000 current and next generation accounting professionals across 179 countries and is one of the largest accounting alliances in the world providing the full range of accounting qualifications.