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3 November 2023

Wendy Hau
Director, Superannuation Access and Compliance Unit
Retirement Advice and Investment Division
The Treasury
Langton Crescent
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Via email: paydaysuper@treasury.gov.au

Re: Securing Australians' Superannuation - Budget 2023-24

Dear Wendy,

The Association of Digital Service Providers Australia New Zealand (DSPANZ) welcomes the opportunity to make this submission on behalf of our members and the business software industry.

About DSPANZ
Digital Service Providers Australia New Zealand is the gateway for the government into the dynamic, world-class business software sector in Australia and Aotearoa New Zealand. Our members range from large, well-established companies to new and nimble innovators who are working at the cutting edge of business software and app development on both sides of the Tasman.

DSPANZ supports the policy intent behind increasing the frequency of superannuation guarantee (SG) contributions and investing in SG compliance to protect the superannuation of all workers in Australia.

As the Association representing Digital Service Providers (DSPs) responsible for delivering SuperStream and Single Touch Payroll (STP), DSPANZ is well-placed to comment on the practical reality of developing and implementing large-scale reforms across the Australian economy. Software developed by our members is relied upon by hundreds of thousands of employers to meet their taxation and superannuation obligations.

Our experience across SuperStream and STP reforms highlights that delivering on both measures from the *Securing Australians' Superannuation* package and providing a smooth SG contribution experience from 1 July 2026 will require the sequencing and alignment of many moving parts. There is a high risk of not meeting this date.

If we adhere to current policy and consultation processes, we anticipate following the below timeline, which will provide the Australian Taxation Office (ATO) and DSPs with less than 12 months for implementation and transition all employers and employees onto payday super:

- **Late 2023 - early 2024:** consultation process is expected to continue.
- **Budget 2024-25:** initial budget and resources allocated.
- **Mid 2024:** meaningful government and industry co-design likely to start.
- **Mid 2025:** second round business case and enabling legislation to be passed by Parliament.
- **Mid-late 2025:** ATO expected to provide detailed technical specifications for payroll, superannuation and gateway service providers.
- **Late 2025 - 1 July 2026:** ATO and DSPs to implement technical changes and transition employers.

While there may be options to fast-track specific components, the underlying issues remain the same. There needs to be more time for effective industry consultation, the passage of legislation, developing technical standards, and providing a sufficient development window enabling the ATO, super funds, processing intermediaries and DSPs to implement technical changes and deliver to market.

DSPANZ is of the considered view that the Treasury has two options for moving forward with payday super:

1. **If the commencement date cannot be changed, the scope of what can be reasonably delivered by 1 July 2026 must be reduced.**
   For 1 July 2026, we believe the most practical path is to move all contributions to a monthly reporting and payment basis. The current processes and technology would continue to be used to support the core processing with the adoption of some minor enhancements (e.g. NPP) to facilitate more timely payments. We propose this option as an interim solution as part of a phased approach to payday super that will see near real-time SG payments by 2030.

   Moving to true 'payday super' requires significant change within the current SuperStream data and payment standards and to the technology stacks across DSPs, super funds and the ATO backend processing by super funds. Employers will also face substantial changes as they adopt new technology and processes while managing cash flow impacts.

   DSPANZ recommends commencing work in 2024 to review the current operation of SuperStream to modernise and simplify the current messaging standard to support payday super and other features of a modern digital economy (e.g. Digital ID). The ATO should lead this work with the Gateway Network Governance Body (GNGB) and DSPANZ appointed as joint co-design leads, reflecting our roles in supporting the delivery and ongoing operation of the SuperStream network.

   DSPANZ recommends scheduling a second tranche of reform from 1 July 2028 with the intent of having all Australian employers paying payday super by 1 July 2030. A second tranche can also be aligned to complimentary programs streamlining tax administration aligned with OECD Tax Administration 3.0 and the ATO's "tax just happens" 2030 vision.

2. **If the commencement date can be adjusted, it must be pushed back until at least 1 July 2028.**
   Moving the commencement date to 1 July 2028 would provide the industry with sufficient time to deliver an experience that will see the payment of SG contributions in near real time. An extended timeframe will allow the industry to work through the following in detail:

   - Undertaking a detailed review of all aspects of SuperStream, which has been in operation for 10 years. This would include preparing for future payment methods.

   - Investigating opportunities to utilise STP data to support superannuation reporting.

   - Investigating opportunities to remove processes and supply chain interactions that add systemic costs to the system, which may be removed by simplifying the data sent to super funds and moving to real-time payment processing.

   - Modernising internal data processing operations within super funds so payments can be processed and allocated in real time. This includes establishing a corrections, errors and receipting framework.

   - Ensuring data standardisation and alignment occurs across SuperStream, MAAS and MATS datasets, eliminating the need for custom fields and transitional data elements, which add complexity. This includes looking to remove the use of the SuperStream Alternative File Form.

   - Mandating the use of DSP employee onboarding solutions for employers to support collecting employee information (including tax and super data) that can be validated at the source and fed into software solutions.

   - Delivering prompts and nudges through DSP software.

We welcome the opportunity to discuss the above options with Treasury in further detail.

Outside of the above feedback, DSPANZ also advocates the following positions:

- Employee onboarding software will continue to play a vital role in the superannuation contributions data supply chain. We believe that software developers should be able to operate within clearly articulated regulatory boundaries and have flexibility with respect to their commercial and business models.

- Government should recognise that business digitisation and ongoing regulatory changes impacting employer operations (e.g. SuperStream, STP) have significantly increased operational costs for software providers as our industry has incorporated new administrative, technical and compliance requirements. DSPs cannot pass all these costs on to employers as the end users.

- As employers have embraced digitising their businesses, they seek more capability from their software and further ways to reduce administrative burden. However, after COVID and significant CPI-related increases, many employers face significant costs limiting their ability to pay for additional functionality, regardless of the benefits. This has led to commercial partnerships between DSPs and super funds that have supported product development and enabled the distribution of new functionality to employers at no additional cost.

- The consultation paper highlights concerns about super fund 'advertising'. Our view is that this is a much broader conversation about how superannuation funds engage the market. As such, any approach must take a whole of economy or market approach and not be limited to a single mechanism, channel or strategy. Including advertising as part of this consultation is a distraction from the core requirements of this policy.

- The ATO should continue providing wholesale services to DSPs, who can integrate and package these services within their retail business software. Only if there has been a market failure would we consider it appropriate that the ATO develops 'retail' solutions. DSPANZ is concerned about the commentary suggesting that the ATO may develop a retail onboarding service that would target new employees. It is not appropriate nor required in the market.

- Developing a retail only employee onboarding solution is not aligned with the ATO's 2030 tax just happens vision and the broader OECD Tax Administration 3.0 blueprint. Efforts should be focused on supporting software to deliver streamlined processes, which includes further investing in ATO's existing API services that support employee registration and stapling.

- We should have a broader conversation about making high-quality ATO data more available to minimise errors and improve data quality across the superannuation ecosystem. This will require a change to the *Tax Administration Act 1953.*

- DSPs see value in the ATO delivering prompts and nudges about SG obligations through software. These notifications should not be considered tax advice.

DSPANZ looks forward to working closely with the Treasury and the ATO on the design and implementation of payday super. We welcome the opportunity to provide further feedback. Please contact Maggie Leese at maggie@dspanz.org or 0487 641 702 for more information.

Yours faithfully,

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Defining ‘payday’

1. What implementation issues could arise if ‘payday’ is defined as being each time a payment is made to an employee with an OTE component?
Multiple definitions are currently used to describe ‘payday’ and the processes surrounding it across different employer obligations, including for Single Touch Payroll (STP); modern award and enterprise agreement requirements; and pay slips. To this end, the definition of payday must align with existing employer processes, such as STP reporting, to avoid creating a new definition and confusing employers.

Consideration will also need to be given to how this policy will apply when a “payday” falls on a weekend or public holiday.

As suggested above, if the commencement date does not change, we anticipate that payday will ultimately be defined in relation to monthly SG contributions.

Updating the SG charge

There are a range of views about the technical feasibility of the proposed payday super methods amongst payroll and super software providers. Either model will rely heavily on a thorough co-design process to unpack how payday super could work across the entire superannuation contributions data supply chain, which includes funds, intermediaries, payroll software, tax professionals and employers.

We also recognise that the success of both options will depend on the ability to match SG contributions with STP reporting.

3. Are there any advantages or disadvantages with the requirements of payday super being fulfilled if employers make the payment of SG contributions on ‘payday’ (i.e. the employer payment model)?
An employer payment model will leave little time for employers to ensure the accuracy of SG contribution payments. This reduced timeframe may see an increase in adjustments being processed.

Under this model and current payroll and banking processes, it will be important to consider when the “payday” period ends. For example, payroll finalisation typically occurs at the end of the day, meaning that reporting and payments may occur after the banking close of business and can be delayed a day. In these situations, would SG contributions be considered paid on time? We also note that in Western Australia, employers currently have three hours less in a day to meet banking deadlines, which often means that reporting is pushed to the next day.

If this model includes a suitable identifier to match SG contributions with STP reporting, reconciliation would be less burdensome for employers.

4. Are there any advantages or disadvantages with the requirements of payday super being fulfilled if the employee's superannuation fund has received employer contributions a certain number of days after payday (i.e. the due date model)?
Under a due date model, we anticipate that payroll reconciliations will be complex for employers, particularly if they have multiple pay runs or make any corrections or adjustments within the same pay period. While this model would better allow payroll adjustments to be captured, it still adds to the complexity of reconciliation.

Streamlining the data set currently sent with a contribution message to simplify fund reconciliation and reduce any errors subsequently returned to the employer is key.

We also suggest that super funds should return a response within 24 hours to the employer if a member cannot be found within their fund registry system.

5. Should there be a standardised due date for SG contributions depending on different pay cycles, independent of the frequency to when salary and wages are paid?
Yes, a standard due date would be most straightforward for employers. We reinforce our view that any standardised due date for SG contributions will allow sufficient time for payroll reconciliation and the return or resubmission of contributions.

6. Would requiring a new reporting mechanism for employers under an employer payment model to the ATO on payday increase compliance burden?
Introducing a new reporting or data mechanism would require significant technological change and an adequate timeframe to educate employers. It would introduce a compliance burden for employers as it includes new steps when paying employees and reconciling payments.

8. Given reduced payment processing times facilitated by modern payment platforms, is a due date of 3 days after payday for superannuation contributions under a due date model feasible? What would prevent this timeframe?
Yes, a move towards new payment methods will enable processing well within 3 days. As previously stated, changes would be required to the contribution data submitted within the message to streamline processing and reduce errors. Super funds should also be required to send a new response message within 24 hours if a member cannot be found.

Given the intent of the reforms are to facilitate faster SG payments, payday super presents the government with an opportunity to phase out Direct Debit (BECS) as a payment method. Direct Debit embeds a 3 day delay as funds are cleared from a clearing house account. During this time, interest is earned and payable to the clearing house, not the member.

From the commencement of payday super, we support the continued use of the BECS (Direct Credit) system as well as NPP as a first step towards payday processing for super. This approach will ensure that super contributions are received by the super fund as quickly as possible so that funds can be allocated to the member account.

With the announcement that BECS will be phased out by 2030, we encourage the government to refine thinking and engage with industry regarding the potential use of Central Bank Digital Currency (CBDC) to support real-time payments from employers.

10. Would shorter payment timeframes require regulation of these financial intermediaries to ensure payment timeframes are met?

Yes, DSPANZ believes that all participants in the superannuation system involved in the processing of employer contribution payments should be brought within the scope of any regulations.

11. How can the payday super model be designed to ensure it can adapt to changes and innovations in payment and data platforms?

While DSPANZ remains agnostic on the use of any payment platforms, we believe that a payday super model should be designed with the flexibility to allow for future payment technologies.

The current approach to only allowing new or alternative payment methods if both parties unilaterally agree is not workable, especially considering that a DSP may operate on behalf of thousands of employers and, therefore, interact with hundreds of super funds.

DSPANZ suggests that the government should consider creating a new SuperStream Data and Payment Advisory Group (SDPAG) that would be responsible for the overarching adoption of new data and payment standards for superannuation with membership including ATO, Treasury, RBA, GNGB, DSPANZ, a super fund representative and an independent member. The SDPAG would be responsible for identifying options, piloting new payment methods, consulting and recommending changes to the data and payment standard.

12. What are the benefits or risks associated with allowing multiple payment methods and how might this affect payments processing for clearing houses and superannuation funds? Would there be benefit or risks in only allowing one payment platform (such as the NPP)?

While we recognise that there is a cost in supporting multiple payment methods, especially for super funds or their outsourced administration providers, there must be flexibility to enable employers to make super contributions. This means that super funds, who will benefit from receiving more regular contribution payments, should be required to support multiple payment methods.

While we are very supportive of the potential for NPP to replace the existing Direct Debit (BECS) system, we also recognise that there is the potential for a Central Bank Digital Currency (CBDC) to be utilised to support superannuation payment processing.

In line with our above suggestion, the introduction of a new SuperStream Data and Payment Advisory Group will ensure that there is a commonly held view before a new payment method is introduced into the SuperStream data and payment standards.

We also expect that BECS (in particular, the use of Direct Credit) will continue as a payment method to support payday super in the short to mid-term until the price point of NPP is equivalent to BECS processing costs.

Tax deductibility and compliance

17. What kinds of prompts or nudges could be provided to employers to be aware of and meet their SG obligations on time?
DSPs see value in the ATO delivering prompts and nudges about SG obligations through software. Any prompts and nudges in software about compliance due dates and obligations should not be considered tax advice under the *Tax Agent Services Act 2009.*

SG charge calculation

DSPANZ supports efforts to streamline the SG charge and ensure that employers who are doing the right thing are not penalised.

ATO flexibility in SG charge remission

28. If you consider that the ATO should have some discretion to remit the charge, under what discrete circumstances should this be able to occur?
The ATO should have the discretion to remit the SG charge in the following circumstances that may be beyond the employer's control as examples:

- Planned or unplanned outages
- Peak periods
- Natural disasters
- Cyber incidents
- Funds merging.

30. Would it be appropriate for the ATO to have discretion to extend the due date for the SG charge? If so, in what circumstances would this be appropriate? Further, what would be an appropriate time period for any extensions? Should there be a limit on this?
Following our answer to question 28, we expect that the ATO could extend the due date for the SG charge in similar circumstances.

Corrections and errors when paying SG

DSPANZ supports having a broader conversation about making high-quality ATO data more available to minimise errors and improve data quality across the entire superannuation ecosystem. We recognise that making such data available will require a law change to the *Tax Administration Act 1953*.

Through a superannuation data standardisation and alignment exercise, DSPANZ recommends reviewing using the acronym "USI", which could mean Unique Superannuation Identifier or Unique Student Identifier to an employee. We expect that confusion between these two terms may account for many data errors in this field.

33. What are the challenges in correcting SG payments under a payday model? Is this an efficient way for employers to make corrections? Should error messages be standardised across funds?

DSPANZ supports delivering a corrections framework for SG payments that is closely aligned with the STP corrections framework. Developing an SG corrections framework and aligning it with the STP framework will require significant consultation.

Error messages should be standardised for all participants across the superannuation system, and they should be visible to employers as we move to a more real-time payment environment where there will be less time to make corrections before becoming non-compliant.

The consultation paper primarily considers examples of unpaid or underpaid SG contributions, but we recognise that overpayments are challenging, particularly when it is for a terminated employee. In some cases, this requires an employee to complete a statutory declaration to send the payment back to the employer. There needs to be a standardised approach to overpayments moving forward, especially with more frequent SG payments.

There may be opportunities to leverage messaging patterns within the rollover process to help standardise an approach to overpayments.

34. Is the 20 business day time period for superannuation funds to resolve errors appropriate in a payday super model?

DSPs can experience lengthy delays when assisting customers with resolving errors in the current system. As we move closer to near real-time payments, a 20 business day time period will not be appropriate for employers to resolve errors within. If the 20 business day period remains, we expect that employers would likely need to pay SG contributions again to avoid the SG charge.

Here, DSPANZ recommends that funds utilise hard error responses and introduce receipt responses to notify system participants once contributions have been applied.

35. Under a 'due date' model, would it be appropriate for a period of grace to apply after the due date for SG contributions? If so, should the grace period apply automatically? Or should be applied at the ATO's discretion in certain limited circumstances?

Yes, DSPANZ supports a grace period applying under a due date model. It is more practical to apply a grace period automatically to all employers. This period would provide employers with the time needed for reconciliation, an opportunity to make corrections and for any errors to be resolved.

Choice of fund, stapling and employee onboarding

36. Would a digital ATO service simplify the choice of fund process and assist employees and employers to confirm the right super details? What functionality would be required? Would this address issues with data integrity under a payday super model? Should such a service be mandated?

The ATO is currently and should continue to be a provider of wholesale services to DSPs, who can then integrate and package these services within their retail business software. Only if there has been a market failure would we consider it appropriate that the ATO looks to develop 'retail' solutions. Further, developing an ATO retail only employee onboarding solution is not aligned with the ATO's 2030 "tax just happens" vision or the broader OECD Tax Administration 3.0 blueprint where these experiences should happen in natural business systems.

DSPANZ fully supports the ATO's role in developing 'wholesale' services that can simplify the employee onboarding experience. To this end, we see value in the ATO and Treasury resolving the legislative and administrative issues that have prevented widespread adoption of the existing stapling service. We would also support the ATO's investment in developing new API services that support simplified employee registration that will enable DSPs to integrate these APIs within their business software. These services may require further investment to reflect better holistic natural business processes, maturing technical requirements and service-level expectations.

We also recognise that other information is captured and verified during DSP employee onboarding processes, such as police and visa checks. We want to avoid setting precedence for government agencies to develop similar retail-only experiences for employers and employees that require them to switch channels during the onboarding process.

37. What are the costs and benefits of requiring employers to offer stapling to employees? Are there other changes that could be made to the choice of fund process? Could a digital ATO service reduce the administrative burden associated with stapling?

DSPANZ has previously provided feedback that there are legislative and administrative obstacles to creating an employer-employee link within ATO systems that prevent the integration of the stapling API within existing employer business processes. We continue to advocate for changes to the stapling API to make the sequencing workable for DSPs, noting that this may require a law change.

While DSPANZ supports the intent of super stapling, without revisions, it does not currently align with software employee onboarding services and add value to employers without requiring substantial changes. For example, lodging a TFN Declaration with the ATO to create the employer-employee link - a process that the ATO intentionally designed to be removed as a stand-alone submission and instead incorporated into the STP2 pay event.

Several DSPs have invested in building the TFN declaration API to enable use of the stapling service and have highlighted the need for the TFN Declaration API to be moved from the Standard Business Reporting (SBR) channel to the Digital Services Gateway (DSG). Moving this API would allow a faster response time from a TFN declaration and establish the employer-employee relationship so software providers can leverage the stapling API service to check for a stapled super fund. We believe this will reduce errors and improve the integrity of the *Your Future, Your Super* measure. It will also significantly reduce the technical complexity for developers of employee onboarding or workforce management software.

DSPANZ does not support the ATO developing a new stapling service that employees would use to notify an employer. Such a process would be cumbersome (for example, how does the employee get the details to successfully link the employer to be notified) and add additional cost and complexity to DSP interactions.

While we support the proposal to incorporate a stapling option within the choice of fund form, there is a need to ensure that employees retain the current opportunities to consider their employer default fund and any other choice funds as part of this process.

We believe that employees deserve the opportunity to make an informed choice about the super fund they choose, even a stapled fund. We expect that information is made available to support the performance and costs associated with the stapled fund API that can be presented back to the employee.

38. What are the costs and benefits of a ban on advertising super products during onboarding?
DSPANZ believes that software developers should have flexibility with respect to their commercial and business models. Broader conversations about superannuation funds and their advertising and acquisition practices should be treated separately from the payday super consultation and must take a whole of economy, whole of market approach and not be limited to a single mechanism, channel or strategy.

We anticipate that banning advertising during onboarding will have unintended consequences for employees, such as funds changing their advertising strategies to target first time employees, potentially resulting in long-term adverse effects as well as making it difficult for employees to choose their employer fund.

SG reporting frameworks

39. How could a smooth transition be managed to aligning STP, SuperStream, MAAS and MATS reporting, either through changing the reporting requirements to year-to-date values or transaction-based reports?
Irrespective of the payday super commencement date, DSPANZ supports work commencing in 2024 to review the current operation of SuperStream to enhance and standardise the current messaging standard to support payday super and other features of a modern digital economy. This review should eliminate the need for custom fields and transitional elements that add complexity. The ATO should lead this work with the GNGB and DSPANZ.

Aligning reporting frameworks and datasets across the superannuation contributions data supply chain will require a co-design process including funds, intermediaries, payroll software, tax professionals and employers. This work will be vital for avoiding errors and data issues as we move to near real-time payments.

It will be essential to consider how STP reports not aligned to paydays, for example, out-of-cycle payments or corrections, may impact other reporting in the super system. Leveraging STP data and its corrections framework in payday super would help to reduce impacts. However, we recognise that not all STP-enabled DSPs will report every STP field.

41. Should a new unique identifier be included as a mandatory field in STP, SuperStream, and MATS which links employers, employees, and transactions?
Creating a unique identifier, for example, a submission ID, will be critical for reconciliations in payday super. Introducing this identifier as a mandatory field in these datasets will require a co-design process that allows sufficient time for implementation and transition.

42. Are there any issues or consequences with including an employer's SG liability and OTE as a mandatory, rather than optional field in STP reporting?
As this would require both a technical and process change, there would need to be sufficient time for the ATO and DSPs to make changes and transition employers. The current confusion around what is considered as OTE will considerably impact data accuracy, which is why introducing a corrections framework is essential under a payday super model.

Self-managed superannuation funds

46. Should there be any changes to the reporting frameworks for SMSFs and/or Defined Benefit funds to the ATO?
DSPANZ believes the validation process used for SMSFs during rollovers could be applied to the contribution process. Currently, if one detail is incorrect, the ATO will send an invalid response, but it does not clarify what is invalid, leaving DSPs and employers to work this out.

Multiple DSPANZ members have developed employee onboarding software that allows employees to choose retail, industry, stapled, employer default, self managed or defined benefits funds. Given the market is already providing software and solutions that work with these fund types, we believe that they should remain in scope for this measure.

Other issues

48. Are there any other impacts on stakeholders or considerations Government should consider in policy design?

Fund mergers
The merging of funds is currently a challenge for many participants in the super ecosystem. How this merging process is handled will need to be improved in a payday super environment, as the volume of issues and errors would not be manageable with more frequent payments.

Impact on modern award requirements
DSPANZ anticipates that changes surrounding payday super will impact requirements such as clauses within modern awards that require casual employees to be paid at the end of each shift. Under payday super, this arrangement may not be possible, and the individuals who rely on these quicker payments may be adversely impacted.

Education and support
The accounting industry may become overwhelmed with the number of SG statements needing to be lodged where corrections are required under a payday super model.

Educating and supporting employers through the transition to more frequent SG payments will be critical to the success of payday super. We recognise that there is currently a skills shortage in the professional payroll industry that supports businesses with more than 100 employees and the managed payroll space. With payday super potentially increasing the complexity involved in reconciliations and processing, we must ensure there are enough skilled professionals to handle this increased workload and support organisations in meeting their obligations.

Small Business Superannuation Clearing House (SBSCH)
The SBSCH was introduced to support small employers (19 or fewer employees) in meeting their superannuation contribution obligations, and the resulting complexity of interacting with many super funds post the introduction of choice of fund legislation in 2006.

When the SBSCH was implemented in 2010, the majority of small employers did not use any payroll software, and the SBSCH provided a simple portal to load required employee information relating to their super and make a payment to the SBSCH clearing account for distribution. The SBSCH was then responsible for distributing the data and associated payments to nominated funds.

The SBSCH was updated to support SuperStream contributions in 2015 and has continued to provide a portal service for small employers.

The introduction of STP for small employers in 2019 resulted in the majority of small employers now having access to payroll software that either provides or can integrate with superannuation solutions to support SuperStream.

It is increasingly clear that while the SBSCH has been a valuable service to small employers meeting the complexity in the super system, the original requirement to support small employers without business software no longer exists.

As the pace of business digitisation increases, it is apparent that the SBSCH has fallen behind in its focus on providing an integrated digital superannuation clearing house solution that integrates with the business systems that small employers use.

DSPANZ believes that there are two options for the future of the SBSCH:

1. Invest in the SBSCH to meet the requirements of modern business (i.e. full API integration delivered via the DSG); or
2. Outsource the SBSCH to a provider of commercial clearing house services that already provide this type of integration and then repackage the APIs and deliver via the DSG.