



2022

Access information from the 2022 meetings of the Superannuation Industry Stewardship Group.

SISG key messages 22 November 2022



Key topics discussed at the Superannuation Industry Stewardship Group meeting 22 November 2022.

SISG key messages 18 August 2022



Information about the key topics discussed at the Superannuation Industry Stewardship Group meeting 18 August 2022.

QC 100342

Superannuation Industry Stewardship Group key messages 22 November 2022

Key topics discussed at the Superannuation Industry Stewardship Group meeting 22 November 2022.

Last updated 6 January 2023

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Key topics discussed at the Superannuation Industry Stewardship Group meeting 22 November 2022

Welcome and introductions

Co-chair Emma Rosenzweig opened the meeting and welcomed members. Apologies were noted and no conflicts of interest were declared.

Superannuation regulator updates

Treasury

Treasury noted October 2022 budget announcements impacting the superannuation and employer markets, including:

- expanding eligibility for downsizer contributions to reduce the minimum eligibility age from 60 to 55 years
- deferred start date for relaxing residency requirement for self-managed superannuation funds (SMSFs) to allow time for the policies to be legislated and implemented.

Several measures had been announced but not legislated by the previous government and will not be proceeding, including:

- the proposed tax and regulatory framework for limited partnership collective investment vehicles
- the 3 yearly audit requirements for certain SMSFs
- the proposal to introduce a requirement for retirement income product providers to report standardised metrics in product disclosure statements.

Treasury has held consultations as part of the review of Your Future, Your Super and in the future expects to undertake consultation on the objective of superannuation. The Treasurer is holding the first of his Investor Roundtables this week focused on leveraging institutional investment into affordable and social housing.

Consultation recently closed on financial adviser professional and educational standards and Treasury will work through the feedback with a view to prepare advice for government.

Treasury confirmed that they continue to work with the government on issues associated with non-arm's length income (NALI) / non-arm's length expenditure.

Australian Securities and Investments Commission

Australian Securities and Investment Commission (ASIC) mentioned the release of observations from the first stage of ASIC's surveillance on internal dispute resolution practices of trustees and noted that a report on internal dispute resolution would be issued before the end of 2022. Further releases about ASIC's surveillance work, including a release on trustee communication about the MySuper performance test and insurance in superannuation will follow next year.



ASIC is continuing work to develop additional guidance on breach reporting. Surveillance of choice products has also commenced.

Further information about ASIC's current enforcement priorities is on the ASIC website and includes misconduct in the superannuation sector, targeting poor design and distribution of financial products and misleading conduct in relation to sustainable finance including greenwashing.

Australian Prudential Regulation Authority

The Australian Prudential Regulation Authority (APRA) provided an update on policy priorities around the prudent management of financial

resources, including:

- Updated [guidance on investment governance for superannuation trustees has recently been released for consultation](#) . The guidance is designed to assist trustees in meeting their requirements under the recently strengthened *Prudential Standard SPS 530 Investment Governance in Superannuation*, which comes into effect on 1 January 2023.
- APRA's amendments to *Prudential Standard SPS 310 Audit and Related Matters* are expected to be released this side of Christmas.
- Draft enhancements to *Prudential Standard SPS 515 Strategic Planning and Member Outcomes* are expected to be released for consultation in early 2023.
- APRA has also begun consulting on a series of measures to [enhance transfer planning](#)  by superannuation trustees in the event they need to transfer members out of or into their fund. Consultation on transfer planning proposals is open until March 2023.
- APRA mentioned that its focus remains on governance, board capability (includes composition and tenure) and upholding the best financial interest's duty in trustee expenditure.

Australian Financial Complaints Authority

The Australian Financial Complaints Authority (AFCA) has released its annual review and updated statistics for the financial year which include information on the top types of complaints.

From 1 July 2022 to 30 October 2022, approximately 2,000 complaints have been lodged relating to superannuation. Many cases are resolved at the registration and referral stage. The top types of complaints continue to be associated with superannuation accounts, death benefit, pension, and insurance in super products.

The main reason for delays experienced in resolving insurance in super complaints/claims appears to be at the insurer end. A third of complaints relate to total and permanent disability and income protection.

Statistics show there have been many cases closed/resolved and it takes an average of 60 days to direct a complaint for decision to an ombudsman or adjudicator if a recommendation is rejected by a party.

ATO

ATO confirmed measures announced in October budget including those already mentioned by Treasury and the Powering Australia – Electric Car discount measure which comes into effect from 1 July 2022.

Emma reminded members that directors who had not already applied for a director ID had until 30 November 2022 to do so. We estimate that there are more than 692,000 directors in the SMSF cohort that are required to apply for a director ID. More than 57% of these (approximately 395,000) have already applied, leaving around 42.9% (approximately 297,000) yet to apply. Emma acknowledged the support from the SMSF Association who have worked closely with the ATO to promote the call to action with their members.

Emma provided information about Downsizer and the First Home Superannuation Saver Scheme (FHSSS) in response to questions received from members.

Downsizer

- As of 30 September, over 49,000 people have made contributions (there have been contributions from over 700 individuals aged 60–64 years since commencement of legislation 1 July 2022 to reduce the eligibility age to 60 years).
- More than \$12.1 billion dollars has been contributed through the scheme.
- Around 55% of contributors are women.
- Treasury added that the average contribution is approx. \$245,000.

FHSSS

- Since 1 July 2018, approx. 31,600 new home buyers have released over \$371 million dollars' worth of savings under the FHSSS.
- 70% that use the scheme are 35 years and under.

There have been 1,200 applications requested under the visibility of superannuation law which allows individuals in a current property settlement proceeding to request super information of their current/former spouse or de facto through the Family Courts.

ATO also mentioned that we were expecting to issue the **first annual snapshot** of ATO compliance activities and employer actions relating to

superannuation guarantee. Further information including highlights from 2021–22 can be found on ato.gov.au

Environmental scan

Members provided updates on emerging priorities and issues for their market, including:

- They continue to see an increase in cybersecurity risks and fraud.
- A number of members have been working with Treasury on the objective of super project and would like to see simplification of limits for consumers and threshold questions answered, for example, what is important in the objective of super.
- The Australian Institute of Superannuation Trustees (AIST) is conducting research to gain insights into why people at retirement age do not appear to commence a retirement income stream.
- AIST is also looking into impacts for women experiencing menopause who are unable to continue working. There are significant social, health and financial impacts for individuals and the economy.
- The Financial Services Council (FSC) is focussing on Your Future, Your Super and policy arising from the Retirement Income Covenant. They are looking to commission research about how other countries approach retirement income policy and to implement a new FSC standard around trustee claims handling. The Tax Institute continues to focus on and advocate for policy reform of NALI measures.
- The SMSF Association has been working with software providers on cybersecurity and continue to monitor increases in establishment of SMSFs to ensure they are doing it for the right reasons.
- Other trustee issues in the current climate of heightened fraud and cybersecurity attacks include member complaints about rollover transactions. Super Consumers Australia are looking to get a better understanding of what trustees are doing within the 3-day obligation for rollovers under the portability rules to understand what funds are already doing to manage the risk of fraud and cybersecurity issues. Members acknowledged that the Gateway Network Governance Board was also doing significant work on these matters.

- The Law Council of Australia expressed concerns from clients on Your Future, Your Super performance tests breach reporting, as well as reporting of best financial interest duty. ASIC confirmed they are working to update guidance to remove confusion in this area.

Fraud and cyber security

Hans van Daatselaar, ASP Services, provided a practitioner and industry perspective on the challenges and opportunities faced in the current climate including recent cyber attacks reported by Optus and Medibank.

The Association of Superannuation Funds of Australia ran a recent pilot to increase visibility, capability and awareness of the issues faced within the superannuation ecosystem. The increase in digitisation and SuperStream connectivity with third and fourth-party stakeholders is seeing an increase in personal information being shared between, ATO and industry, funds, employers and now also increasingly with SMSFs.

It was agreed that a working group would be established, led by APRA, and include a subset of representatives of the Superannuation Industry Stewardship Group (SISG) member organisations to understand and document fraud risks, and the effectiveness of existing controls, including actions required to strengthen/mitigate against emerging risk areas to safeguard member accounts and member data.

The SISG secretariat will liaise with APRA, ASIC and ATO representatives on the scope of the working group and request suggested nominations or additional parties to be involved from members.

Members acknowledged this was a shared problem and that one of the first steps would be to develop a shared vision of how we would respond and that we need to maintain an ongoing focus in this area.

Insurance in super

AFCA provided some insights of the issues generating an increase in complaints in this area:

- Cancellation of insurance appears to be the main cause for a range of reasons but mostly because of inactive accounts.

- AFCA receive an average of 18 complaints a month that insurance has been cancelled, and an average of 4 complaints a month that a claim has been denied because there was no insurance in place.
- For every member that lodges a complaint there is a number of additional members potentially affected.
- Most of these complaints tend to close early in the process. About 11% of complaints go through to an ombudsman or adjudicator for decision.
- Disclosure by trustees has improved over the year.
- Common issues raised by complainants include 'I didn't consent', 'I was never notified' or the individual has gone to get their cover reinstated and has discovered additional conditions are now in place.
- Some people have their cover cancelled, then pass away or need to claim an event and encounter that they do not have any cover.
- Notices about cancellations sent by post or email often go unread or end up in the bin or a spam folder as junk mail. The better approach is to use 2 methods of communication, and to follow up by SMS that they have received the correspondence.
- AFCA has the ability to exercise discretion and not continue with the complaint if it is clear the trustee has made no error.
- AFCA receives complaints from those with unwanted insurance, where they realise they have been paying for insurance over a number of years.

Super Consumers Australia has been advocating for a review of insurance in super to determine if there are areas that we can do better to provide consumers with protection.

According to APRA's MySuper data publication, some funds like UniSuper and MLC appear to have high rates of MySuper members who opt out of insurance in super. This suggests different fund practices could make a difference to outcomes.

In response to questions about what more could be done to ensure members receive, read and open communications about insurance, SISG members raised ideas including:

- using multiple communication channels, potentially including the MyGov inbox
- making insurance information more prominent in annual statements.

Another potential option is to conduct an annual health check with members, similar to what the ATO does as part of the tax return process which prompts individuals to check other elements of their account/cover.

ASIC is undertaking further work on identification fraud and insurance in super and will report back on their findings at the next SISG meeting. In addition, following on from the advice review, ASIC is considering what additional guidance is required to support the industry to improve communication with their clients.

Members agreed to revisit some of the ideas raised during this meeting at the next SISG meeting.

Status of worker

A draft Taxation Ruling (TR) and Practical Compliance Guide (PCG) were provided to SISG members for initial comments. These documents are under embargo until they are published for consultation, expected in early December. Consultation on the TR and PCG will remain open until February 2023. ATO provided an introduction for the topic including:

- Following High Court decisions, ATO developed a decision impact statement advising we were reviewing our public advice and guidance in relation to classification of workers.
- The TR has been revised to reflect the principles considered and set out by the High Court in the *Personnel Contracting* and *Jamsek* cases.
- The draft PCG outlines the Commissioner of Taxation's compliance approach and shows where the ATO will allocate compliance resources to investigate classification of worker concerns using a risk-based approach.

Members discussed the approach outlined in the PCG and commended the ATO for providing this additional level of guidance and support, in particular for small business who may not have the resources to pursue these matters on their own. While the PCG

provides some guidance it was noted that some businesses may choose to seek additional or specialist advice depending on their circumstances.

Global Pension Index

David Knox, Mercer, provided members with a summary of some of the highlights from the Mercer CFA Institute Global Pension Index 2022.

Forty-four retirement income systems from around the world were assessed based on adequacy, sustainability, and integrity.

Australia rated sixth place at B+ grade. Iceland, the Netherlands, and Denmark were the only countries assessed as A grade.

Members discussed some of the things those other countries were doing that Australia could do to reach A grade including:

- increase the coverage of employees (including non-standard workers and those self-employed) in the super system' noting that removal of the \$450 threshold is a nod in the right direction
- increase the pension age gradually to reflect increasing life expectancy
- promote higher labour force participation rates at older ages which can increase savings available for retirement
- review retirement income strategies in place and whether part of the benefit needs to be an income stream. Retirement income projections could be mandated to improve understanding and confidence for members.

Review of SISG

Members discussed operation of the SISG including achievements, forward priorities, coverage of membership and meeting processes. Feedback included:

- SISG is a value-added forum and supports members to maintain a strategic view of issues impacting the industry, for example, through the environmental scan and discussions on cyber security.
- Members appreciate regular updates from regulators including Treasury.

- Members appreciate the collaboration, mutual trust and respect shared between SISG members.
- Members recognised that more consideration is being put towards determining agenda items and promoting input from members and useful discussion.
- Members noted that the SISG provides an opportunity for much wider input and reflection rather than just a focus on tax matters.
- Members feel the diversity of the group is adequate and additional thought could be given to special appearances from other groups as required, for example, Austrac.
- Members feel the format of the hybrid hub/WebEx meeting works well and those online feel included in the meeting.
- ATO outlined a change in approach to setting the agenda for future meetings where members will be approached via email to ask for topics for upcoming meetings. Regulators asked to maintain the regulator agenda preparation sessions.
- Suggested topics and focus areas for 2023 include
 - cyber security
 - insurance
 - effectiveness of communication and quality of advice
 - financial advice
 - investor roundtable issues
 - formal audit of superannuation funds
 - superannuation issues for First Nations people
 - Your Future, Your Super review
 - data quality in super.

Members asked about the loss of a specific Tax Technical forum to discuss superannuation matters. ATO reaffirmed that we are happy to organise special purpose working groups on specific topics as required.

Attendees

Attendees list

Organisation	Member
ATO	Emma Rosenzweig (Co-chair), Superannuation and Employer Obligations
ATO	Larissa Evans, Superannuation and Employer Obligations
ATO	Peta Lonergan, Superannuation and Employer Obligations
Association of Super Funds Australia	Glen McCrea
Australian Financial Complaints Authority	Heather Gray
Australian Institute of Superannuation Trustees	Melissa Birks
Australian Prudential Regulation Authority	Carolyn Morris
Australian Prudential Regulation Authority	Mike Cornwell
Australian Securities and Investments Commission	Jane Eccleston
Chartered Accountants Australia and New Zealand	Tony Negline
Industry Super Australia	Ella Cebon
Law Council of Australia	Maged Girgis
Mercer	David Knox (Co-chair)

SMSF Association	Peter Burgess
The Tax Institute	Phil Broderick
Treasury	Lynn Kelly

Guest attendees

Guest attendees list

Organisation	Attendee
ATO	Eric Armstrong, Office of the Chief Tax Counsel
ATO	Kylie White, Superannuation and Employer Obligations
ATO	Malcolm Allen, Superannuation and Employer Obligations
ATO	Michelle Allen, Superannuation and Employer Obligations
ATO	Usha Narain, Superannuation and Employer Obligations
ASP Services	Han van Daatselaar
Australian Prudential Regulation Authority	Bruce Young
Australian Prudential Regulation Authority	Chanum Torres
Australian Prudential Regulation Authority	Claire Mitchell
Australian Prudential Regulation Authority	John Singh
Financial Services Council	Aidan Nguyen

Super Consumers Australia	Rosie Thomas
Treasury	Luke Spear

Apologies

Apologies list

Organisation	Members
Australian Securities and Investments Commission	Jessica Spence
Business Council of Australia	Ben Davies
COTA Australia	Ian Yates
Financial Services Council	Spiro Premetis
Link Group	Deborah Schembri
Super Consumers Australia	Xavier O'Halloran

QC 71207

Superannuation Industry Stewardship Group key messages 18 August 2022

Information about the key topics discussed at the Superannuation Industry Stewardship Group meeting 18 August 2022.

Last updated 20 September 2022

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Welcome and introductions

The Chair opened the meeting, welcomed members, and reviewed apologies. No conflicts of interest were declared.

Superannuation regulators updates

Treasury

Treasury noted the following focus areas:

- Consultation on performance test treatment of Faith-based products has now closed and Treasury will work through the feedback.
- The review of Your Future, Your Super announced in July 2022 will include review of best financial interest duty and the comparison tool.
- Treasury is undertaking a review of financial adviser education standards and expects to be able to release a consultation paper within the next month.
- Treasury is planning to brief the Assistant Treasurer shortly on consultation and issues associated with non-arm's length income/expenditure including some of the proposed policy changes raised by industry. Industry stressed the need for urgent consideration of legislative change and was encouraged to provide

more detailed advice to Treasury on the practical implications and lead time required to implement change.

Australian Securities and Investments Commission

Australian Securities and Investment Commission (ASIC) advised of the upcoming release of their corporate plan which includes priorities for product design and distribution, retirement decision making, sustainable finance practices and technology risks.

As they reach the anniversary for reforms for breach reporting, ASIC is expecting to review and consult on some of the pain points and areas of confusion identified by stakeholders.

New legislative requirements associated with design and distribution obligations of financial products is also nearing its first-year anniversary and ASIC is reviewing how industry is complying with those obligations.

ASIC is doing more detailed work on a review of internal dispute resolution and will be in a position to share its findings by the end of the calendar year.

The forward workplan also includes:

- communications on portfolio holdings disclosure, Regulatory Guide 97 and Target Market Determinations
- updates to Information Sheet 170 *MySuper product dashboard requirements for superannuation trustees* with regards to stitching
- expectation letters for trustees for those likely to fail the second round as we move into the second round of performance tests
- work with the Australian Prudential Regulation Authority (APRA) on the implementation of the Retirement Income Covenant (RIC) including what's good and what needs to be improved in terms of retirement strategies
- choice product distribution – undertaking a proactive surveillance project to review trustee obligations and transparency of obligations
- insurance in super – undertaking surveillance work to look at progress made on a number of areas raised over the past few years
- trustee oversight of advice fee deductions – ASIC will be checking on industry practices

- trustee transparency – reviewing industry practice and communicating expectations
- work carried out by other specialist parts of ASIC – whistle-blower obligations is still an area of focus, remediation guidance to be issued soon; and work is being undertaken on issues for Indigenous Australians.


Australian Prudential Regulation Authority

APRA is in the midst of the second round of performance tests and expects results to be published by 31 August 2022. Work also continues on the next iteration of the heatmaps which will be published in December including MySuper and Choice heatmaps.


APRA has released consultation on proposed changes to Prudential Standard SPS 515 *Strategic Planning and Member Outcomes* which includes:

- strengthened requirements to ensure trustees deliver quality outcomes to all cohorts of members in a more measurable way
- increased board oversight of financial projections and resources
- more timely action to address areas of underperformance including transferring members to better performing products or funds.

APRA continues to work closely with ASIC to review retirement income strategies issued since the introduction of the RIC and expects to issue further guidance on this matter.


ASIC/APRA gave a joint speech to the [Conexus Retirement Conference](#)  on 17 August 2022.

Australian Financial Complaints Authority

The Australia Financial Complaints Authority (AFCA) has released the end of year statistics [Data snapshot 2022](#)  which shows over 5,200 complaints were received last financial year in the superannuation space. A third of those complaints were associated with insurance matters and approximately 3,000 complaints were associated with a superannuation account; such as account administration errors and rollovers not received in time.

AFCA mentioned that there continues to be a steady stream of complaints associated with death benefits – approximately 450 for the

last year. A few of those, raised issues around binding nominations and non-lapsing nominations.

AFCA conducted its latest member forum on 11 and 12 August – recordings from this forum will be available on [the AFCA website](#) .

Legislation to address matters arising from the dissolution of the Superannuation Complaints Tribunal (SCT) has now passed. Where there is an appeal from an SCT decision and the Federal Court orders that the matter be remitted, the remittal will now be to AFCA.

AFCA's new fee model is now in place. AFCA continues to receive a lot of questions about this which will be addressed in the facts and questions on their website.

AFCA continues to receive a huge number of insurance complaints resulting from recent natural disasters along the eastern seaboard. AFCA have had to clarify the categories of complaints they can/cannot consider.

ATO

The ATO has released its **Corporate Plan for 2022–2023**. The plan incorporates 7 key focus areas including expanding the use of Single Touch Payroll (STP) data to simplify employer reporting obligations and proactively address superannuation guarantee non-compliance. A particular area of focus will be on quality and timeliness of data reported by funds.

Other areas noted in ATO's update include:


- Work is underway to develop best practice guides for reporting, particularly for large funds and will be shared with industry for feedback.
- We have seen close to 20 million STP records now finalised so that employees can complete their 2021–22 income tax return. About 800,000 remain unfinalised and nudge letters are expected to issue to these employers in the coming week.
- ATO's annual publication of Taxation Statistics has been published and includes a comprehensive summary of information taxpayers report to us. Emma Rosenzweig reinforced our approach to be transparent with industry about data on programs administered by the ATO which can be found on the ATO website. Any additional data used to assess risks, make operational decisions, or that goes

to the effectiveness of government policy, is a matter for government to decide to release.

- Work on the review of the Super Choice Form continues as we work through feedback received from various funds, small business, and tax and BAS agent stakeholder groups. User testing has been conducted with positive feedback being received on improvements to readability, user flow and the design of the new form. ATO expects the new form to be available in the next couple of months and will communicate with funds closer to the publication date.
- There have been questions raised about the compliance approach and whether an employer can make payments for new employees into a closed fund. ATO confirmed that employers can still pay into closed funds where the employee has an open account. Employers cannot, however, create new accounts in closed funds (that is, those that have failed the performance test twice). APRA confirmed they are planning supervisory work to engage with products that failed last year, to understand what preparations are underway should they be close to failing a second time. This includes correspondence with employees that are likely to be impacted.
- The Director ID project team provided a project update that was included with the meeting papers. Emma Rosenzweig reinforced that directors appointed before 31 October 2021 have until 30 November to apply for a Director ID. The SMSF Association asked about communications planned for self-managed super funds (SMSF) with shelf companies who are not able to get a Director ID. ATO will follow up with the Director ID project team and respond to the SMSF Association.

Environmental scan

Industry members noted the following:

- Industry associations had been engaging with their funds to review strategies in light of the Retirement Income Covenant.
- SMSF stakeholders continue to experience frustration and are working closely with APRA fund administrators to resolve SuperStream transaction issues.
- The [Australian Small Business and Family Enterprise Ombudsman has urged small businesses to take urgent action to safeguard and register their internet identity](#)  before the 20 September deadline.

Australian businesses with an existing domain name have until 20 September to reserve or register their equivalent au domain name before it becomes available to the general public.

- Council on the Aging (COTA) is looking into the general nature of retirement strategies to see what industry can do to improve on more definitive advice for those in the 60 to 65+ year old cohort. They continue to raise the dilemmas around adequate advice for retired members with the Assistant Treasurer.

Update from ATO Second Commissioner

ATO Second Commissioner, Jeremy Hirschhorn provided SISG members with a brief update on matters of interest including:

- the strategic importance of participation and feedback received from this group to improve the client experience and administration of Australia's taxation and superannuation system
- insight on the structure and operation within the ATO including that of the client engagement group – our intent is to maximise on intervention early rather than wait until it becomes a compliance issue
- our priorities which include early intervention on debt, integrity, cyber security, and fraud.

Members discussed key issues impacting industry including:

- access to ATO data so that financial planners and industry could provide better advice for individuals – Jeremy reaffirmed our privacy constraints and obligations to manage data that is submitted to the ATO and explained that there might be more opportunities to work in conjunction with the Australian Bureau of Statistics to see how we could share more unit level or aggregate data about cohorts within existing constraints.
- managing IT priorities and resource constraints including the magnitude of change currently impacting the industry
- opportunities where the ATO could improve and empower individuals with more holistic information about their financial position to support interactions with mortgage brokers and banks
- moving to real-time payment of superannuation guarantee (SG), recognising that it is a policy matter for government – ATO

acknowledged that our figures showed that 40% of employers (equalling 76% of the dollar value) already pay more regularly than quarterly.

Superannuation guarantee


The ATO led a discussion on superannuation guarantee and activities to ensure compliance including:

- the ATO's role in the Superannuation and Employment system
- SG in operation including our **net gap**, changes to the minimum SG rate and removal of the \$450 per month threshold
- employer demographics
- Help and Assist initiatives that ATO has undertaken to educate and support employers to meet their SG obligations
- information about our proactive (education), preventative (opportunities to self-correct, reminders and nudges) and enforcement approaches to SG compliance
- SG liabilities and penalties including those raised, collected, and distributed as a result of employee notifications, ATO initiated compliance activities and employer voluntary disclosures
- information that can be disclosed to employees
- collection of unpaid SG.
- our future vision to continue to implement a preventative approach to SG non-compliance, based on guidance, early intervention and proactive data driven activities, to help employers to comply with their obligations and ensure employees receive their full SG entitlement.

Discussion noted:

- There is a 37% increase in use of the business segment on ato.gov.au including 'Do I have to pay SG' webpages.
- ATO is happy to have ATO staff engage with other member organisations to support and supplement their education/communication campaigns. White label content (for example, examples of correspondence and articles) that are used

for clients will continue to be shared with stakeholders and stewardship groups.

- Facebook and LinkedIn appeared to be more popular channels for employers and businesses to receive information rather than Twitter.
- Obtaining a further understanding of the impact of the removal of the \$450 threshold may not be known for a couple of years as the SG gap is a lag indicator.
- There is an increase in the volume of Director Penalty Notices raised and a return to pre COVID-19 enforcement setting to resolving SG debt.
- There is an increase in client-initiated insolvencies. ATO encourages business struggling to meet SG obligations to engage with the ATO early on.
- STP data can be aligned with information reported by funds to engage with employers earlier.
- ATO agrees with the recommendations around debt recovery and increased use of powers recommended as part of the recent Australian National Audit Office report into [addressing SG non-compliance](#) .
- ATO is also actively monitoring current cases and case law associated with the status of employer under the SG Act and once confirmed, or if required, will arrange for an update to rulings.

Attendees

Attendees list

Organisation	Member
ATO	Emma Rosenzweig (Co-chair), Superannuation and Employer Obligations
ATO	Melanie Casey, Superannuation and Employer Obligations

ATO	Michelle Allen, Superannuation and Employer Obligations
Association of Super Funds Australia	Glen McCrea
Australian Financial Complaints Authority	Heather Gray
Australian Prudential Regulation Authority	Katrina Ellis
Australian Securities and Investments Commission	Jane Eccleston
Australian Securities and Investments Commission	Jessica Spence
Chartered Accountants Australia and New Zealand	Tony Negline
COTA Australia	Ian Yates
Financial Services Council	Spiro Premetis
Industry Super Australia	Ella Cebon
Law Council of Australia	Michael Mathieson
Link Group	Deborah Schembri
Mercer	David Knox (Co-chair)
SMSF Association	Peter Burgess
Super Consumers Australia	Xavier O'Halloran
The Tax Institute	Phil Broderick
Treasury	Lynn Kelly

Guest attendees

Guest attendees list

Organisation	Attendee
ATO	Anita Challen, Lodge and Pay
ATO	Jeremy Hirschhorn, ATO Executive
ATO	Kylie White, Superannuation and Employer Obligations
ATO	Malcolm Allen, Superannuation and Employer Obligations
ATO	Mandy Chivers, ATO Corporate
ATO	Rebecca Knill, Superannuation and Employer Obligations
Australian Institute of Superannuation Trustees	David Haynes
Australian Securities and Investments Commission	Bradley Ruting
Treasury	James Thompson

Apologies

Apologies list

Organisation	Member
Australian Institute of Superannuation Trustees	Eva Scheerlinck
Australian Prudential Regulation Authority	Carolyn Morris

QC 70397

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