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2025

Access information from the 2025 meetings of the Superannuation Industry Stewardship Group.

Superannuation Industry Stewardship Group key messages 5 November 2025

Key topics discussed at the Superannuation Industry Stewardship Group meeting 5 November 2025.

Superannuation Industry Stewardship Group key messages 3 September 2025

Key topics discussed at the Superannuation Industry Stewardship Group meeting 3 September 2025.

Superannuation Industry Stewardship Group Key Messages 4 June 2025

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Superannuation Industry Stewardship Group key messages 5 March 2025

Key topics discussed at the Superannuation Industry Stewardship Group meeting 5 March 2025.

Superannuation Industry Stewardship Group key messages 5 November 2025

Key topics discussed at the Superannuation Industry Stewardship Group meeting 5 November 2025.

Published 7 January 2026

Superannuation regulators updates

Treasury updated the group on:

- Payday Super
- Changes to low-income superannuation tax offset, with Treasury publishing a fact sheet outlining the government's position and planned approach.
- The government has outlined changes to the Better Targeted Superannuation Concessions Bill. Treasury has published a factsheet on the announced changes.
- Performance test review.
- Consultation has occurred on the draft member service standards. The next step is for legislation and/or regulations to be released for public comment.
- Retirement phase reforms continue to be progressed, including a retirement reporting framework and best practice principles for retirement products.

The Australian Prudential Regulation Authority (APRA) updated the group on:

- Governance reforms, including amended proposals on independence, pre-approval and tenure. Further consultation on draft standards and guidance is planned for 2026.

- APRA continues to enhance transparency on fund and industry expenditure, with the next data release expected in December 2025.
- Members were invited to provide feedback on APRA's strategic plan, particularly regarding balancing regulatory burden and financial system stability.

Australian Securities and Investments Commission (ASIC) has launched its report on public and private markets, with a specific focus on superannuation and the critical stewardship role that super trustees play in shaping market outcomes.

Other items included:

- Reviewing responses to the regulatory simplification consultation, focusing on how stakeholders interact with ASIC and exploring ways to streamline regulatory guidance.
- Participation in Council of Financial Regulators working groups.
- Continued focus on member services. ASIC is following up on improvements to death benefit claims handling this year.
- ASIC has published its thematic review on retirement communications with examples of better practices.
- A joint 'pulse check' survey with APRA on implementation of the Retirement Income Covenant.

The Australian Financial Complaints Authority (AFCA) noted there has been a decline in superannuation complaints for the 2024–25 financial year, to just over 6,000. Complaints about delays dropped by 40%, and death benefit complaints also fell due to regulatory action and improved fund practices.

Most complaints related to account management issues, with smaller volumes for disability, income protection, and pensions.

The Australian Taxation Office (ATO) is well progressed in preparations for Payday Super, which will take effect from 1 July 2026. The current centrepiece is the draft compliance guidance PCG 2025/D5, outlining a risk-based approach for employer compliance in the first year that considers the challenges of implementation. Employers who attempt to comply and resolve issues quickly will be at lower risk of compliance action.

Payday Super requires changes right across the employer and super fund ecosystems. Super funds need to put plans in place now to update systems and processes to:

- Return unallocated employer contributions within 3 business days, down from 20.
- Implement SuperStream v3 changes by 1 July 2026, including better error messaging, faster payments through the new payment platform, and new member verification requests.
- Maintain accurate and timely reporting of member account and transaction data to the ATO through the Member Account Attribute Service and the Member Account Transaction Service (MATS).

The Small Business Superannuation Clearing House (SBSCH) will be closed from 1 July 2026, with new users no longer able to register from 1 October 2025.

Communications for Payday Super will be ramped up utilising existing channels. Supporting videos and white labelled products will be developed for stakeholders and third parties to cross promote.

Other items included:

- The paid parental leave project is on track for a 1 July 2026 start date.
- Superannuation guarantee compliance results outlining compliance actions undertaken for 2024–25 financial year are expected to be published 17 November.
- 2024–25 compassionate release of superannuation data was released on 16 October, showing a significant growth in applications and the amount approved, specifically in relation to dental treatments. Compliance focusing on high-risk behaviours of registered agents and health practitioners is progressing.
- 2024–25 unclaimed super monies (USM) data was released on 28 October, showing an increase consistent with annual trends. The ATO continues to focus on reuniting individuals with lost super and expects that data improvements and Payday Super to help reduce the incidence of multiple accounts and in turn reduce lost accounts that could become future USM.
- Practice statement guidance is being developed regarding penalty and remission principles where employers or super funds fail to

comply with event-based reporting obligations such as those that apply for Single Touch Payroll and MATS.

High-risk super switching

ASIC provided an update on its consumer campaign and regulatory work following the collapse of the First Guardian and Shield Master Funds, which have impacted approximately 12,000 customers and over \$1 billion in assets. The business model of concern involves advisers encouraging members, often via telemarketing, following click-bait advertising, to switch their super into platform-style products, many of which are high-risk and inappropriate for retirement purposes. The discussion noted:

- AFCA held a webinar for people affected by the First Guardian/Shield collapse, which can be viewed on their website.
- APRA has completed a review of major platform providers and published the findings on its website. The review identified weaker practices in areas of onboarding, ongoing monitoring and remedial action and member transfers.
- Financial Services Council is progressing work on best practice principles, developing guidance and governance principles that cover almost all platform providers.

Roundtable with Rob Heferen

The Commissioner of Taxation, Rob Heferen attended the meeting to discuss key superannuation priorities and to hear from members on issues that are important to them and their clients. Items discussed included:

- Payday Super
- compassionate release of super
- USM.

The Commissioner reaffirmed the ATO's commitment to implementing its new Vulnerability Framework, acknowledging the challenge of tailoring support at scale.

Members discussed the importance of connected data flows across Common Reporting Standard, USM, and super guarantee compliance

to ensure integrity and better member outcomes. Suggestions included leveraging ATO-held data to assist funds in resolving duplicate accounts and improving transparency.

Vulnerability Framework

The ATO has released its **Vulnerability Framework**, which was published on 21 October, following extensive consultation that included 71 submissions and over 500 pieces of feedback. The framework sets out the ATO's commitment to supporting people experiencing vulnerability within the tax and super system. It was shaped by input from community advocates, service providers, government and non-government organisations, and stewardship groups.

The focus now moves to practical implementation of the framework's principles to achieve long-term change. The ATO is considering the feedback it has received through consultation in implementing the principles in the framework and acknowledges that creating meaningful change will take time.

Attendees

Attendees list

Organisation	Attendee
ATO	Ben Kelly (Co-chair), Superannuation and Employer Obligations
ATO	Justin Micale, Superannuation and Employer Obligations
ATO	Rob Heferen, Commissioner of Taxation
ATO	Robert Thomson, Individuals and Intermediaries
Actuaries Institute	Timothy Jenkins

Australian Financial Complaints Authority	Heather Gray (Co-chair)
Australian Prudential Regulation Authority	Chanum Torres
Australian Prudential Regulation Authority	Ian Beckett
Australian Prudential Regulation Authority	Lilian Martin
Australian Prudential Regulation Authority	Sarah Nicholson
Australian Securities and Investments Commission	Nicole Chew
Australian Securities and Investments Commission	Pippa Lane
Australian Securities and Investments Commission	Rhys Bollen
Business Council of Australia	Stephen Kirchner
Chartered Accountants Australia and New Zealand	Helena Gibson
Financial Services Council	Kirsten Samuels
Gateway Network Governance Body	Michelle Bower
Law Council of Australia	Anne Clarke
MUFG Pension & Retirement Solutions	Deborah Schembri
SMSF Association	Mary Simmons
Super Consumers Australia	Jessica Spence
Super Consumers Australia	Xavier O'Halloran

Super Members Council of Australia	Hannah Cole
The Association of Superannuation Funds of Australia	Julian Cabarrus
The Tax Institute	Phil Broderick
Treasury	Lachlan Alvey
Treasury	Ruth Moore
Treasury	Sally Greener

Apologies list

Apologies list

Organisation	Member
Australian Prudential Regulation Authority	James Douglas
Chartered Accountants Australia and New Zealand	Tony Negline
COTA Australia	Patricia Sparrow
Grow Inc	Adam Gee
Law Council of Australia	Michael Mathieson
SMSF Association	Peter Burgess
Treasury	Brendan McKenna

Superannuation Industry Stewardship Group key messages 3 September 2025

Key topics discussed at the Superannuation Industry Stewardship Group meeting 3 September 2025.

Published 9 October 2025

Superannuation regulators

Treasury

Treasury provided an update on recent economic reform roundtable and investor roundtable, noting the following items relating to superannuation are for further consideration:

- The Treasurer announced the government would consider the settings of the superannuation performance test to ensure there are no unnecessary obstacles or impediments to institutional investment in areas like housing.
- Investor roundtable participants agreed that reform will be more effective with a shared industry view on the way forward.
- The government has asked agencies, through the Council of Financial Regulators, for ideas to reduce regulatory burden, including through addressing duplicative reporting and data collection.

Treasury has released consultation papers on the government's announced Retirement Reporting Framework and Best Practice Principles for superannuation retirement income solutions. Members were encouraged to provide input.

Legislation for the Better Targeted Superannuation Concessions and Payday Super measures is continuing. The government recognises the urgency of implementing the Payday Super legislation. Treasury and

the Australian Taxation Office (ATO) are working towards the 1 July 2026 start date, and industry is advised to prepare accordingly.

Regulatory initiatives grid

The regulatory initiatives grid was first published in December 2024 and included 71 initiatives across multiple government agencies.

Feedback has been positive on the grid, noting it's a transparency tool that helps streamline consultation and reduce duplication.

The second version will be published in September 2025, incorporating stakeholder feedback and roundtable outcomes. Going forward, the grid will be updated every 6 months, supporting better regulatory planning and coordination.

Australian Prudential Regulation Authority

The Australian Prudential Regulation Authority (APRA) has released their 2025–26 Corporate Plan. There is an important emphasis on getting the balance right across our regulated industries as balance maintenance of financial stability and safety with competition and efficiency.

Other topics of interest included:

- Governance review – APRA will provide an update later this year on the feedback received from the recent consultation as well as an update on next steps.
- Retirement phase work – A pulse check is being developed in collaboration with Australian Securities and Investments Commission (ASIC), with results to be published by the end of the year. A consultation paper on implementation of the Retirement Reporting Framework is planned for end of the year noting it is linked to the current government consultation on high-level metrics.
- The 2026 comprehensive product performance package review will integrate retirement product data.
- The latest superannuation performance test data was published on 29 August 2025.
- As the superannuation industry continues to evolve, some funds will face strategic challenges in maintaining competitiveness and in delivering for members into the future. An insights article will be released, highlighting some of those challenges.

Australian Securities and Investments Commission

ASIC has released their 2025–26 Corporate Plan. For member services, there will be a review of whether there has been an uplift in practices in death benefits and claims handling following REP 806, alongside the next thematic review on complaints to strengthen member service delivery.

Other items of interest included:

- Retirement communications thematic review is nearing completion, with insights expected to inform future retirement income covenant strategies.
- A targeted review of fees and costs disclosure in RG 97 is underway examining how stamp duty is disclosed. As part of this work ASIC is also considering how private debt arrangements are disclosed within portfolio holdings disclosure. A working group is scheduled to meet next week to progress this work.

Australian Financial Complaints Authority

Australian Financial Complaints Authority (AFCA) provided a complaint data overview for the 2024–25 financial year:

- Total complaints received were 6,164, showing a 16% decrease from the previous year.
- Complaints relating to a delay in complaint handling are still present but reduced to 17% of total, down from 24% last year.
- Death benefit complaints are decreasing.
- Pension-related complaints are a small but growing category. Common issues include late payments, failure to adjust pension amounts as requested, or continuing payments after a stop request.

As Australia's demographics shift, more people are accessing their super for retirement, potentially leading to more pension complaints.

ATO

In the ATO Corporate Plan 2025–26 key priority for super funds is the implementation of Payday Super, a reform designed to close the superannuation guarantee (SG) gap and ensure Australians receive the retirement savings they are entitled to.

While this measure is not yet law, from 1 July 2026 employers will be required to pay SG contributions on the same day they pay salary and wages.

It is important super funds understand the updates we are making to SuperStream in readiness for Payday Super and begin planning their implementation strategies to ensure compliance by the 1 July 2026 deadline.

The ATO Corporate Plan notes the following as **key areas of focus** for self-managed super funds (SMSF):

- outstanding SMSF annual returns
- compliance with release authorities
- compliance with commutation authorities
- illegal early access
- fraud prevention.

Updates were also provided on:

- Payday Super consultation activity.
- The ATO's media release on 26 August 2025 regarding compassionate release of super, reminding people that access to super on compassionate grounds is available in very limited circumstances for critical medical procedures and should only be considered as a last resort where all other options for paying the eligible expenses have been exhausted.
- Recent spikes in SMSF registrations, and areas of concern.

Duplication in data reporting

During the recent roundtables, feedback was noted of duplication of data reporting required from superannuation funds to government agencies. Members were asked to consider this and provide examples of where there is overlapping or duplicated reporting, to assist in the identification of opportunities to streamline obligations.

Work continues on this and will be revisited at the next meeting.

Environmental scan – member updates

Grow Inc shared an overview of the superannuation administrator competitor landscape, noting the market is becoming increasingly competitive. The shared challenges of the industry were discussed, as were opportunities for providers.

The Gateway Network Governance Body (GNGB) is an industry owned governance body that oversees and maintains the integrity, security and efficiency of the superannuation transaction network in Australia. GNGB provided an update on the biggest risks for Successor Fund Transfers and the 2025 Superannuation Cyber Incident Response Exercise.

Fraud and cyber security

Members discussed ongoing work in the industry regarding improving cyber resilience and coordination of incident response across the industry. Conversations are ongoing, with an update to be provided at the next meeting.

ATO app

The ATO app is a simple and easy way for individuals to quickly access their personal tax and super information in one place. The app is free to download and use.

As part of the ATO's counter fraud program, we are delivering security enhancements through the ATO app, with new features including security messages, and the ability to lock a taxpayer's ATO record. This means that taxpayers that register their device using the ATO app will receive a real time message when key changes happen on their ATO account. Events that will trigger an alert include:

- change of financial institution details
- income tax lodgment
- myGov overlinking, that is if the ATO online services account is linked to a different myGov account.

When an individual receives a security message about their ATO account, they will be prompted to review the details. If the changes look suspicious, they will have the option to lock their account. To unlock the account, the individual will need to contact the ATO to verify their identity and commence remediation activities.

Improving website communications – a funds perspective

Some members provided an overview of how superannuation funds are responding to ASIC's death benefits review. This overview incorporated findings from a sample of their member superannuation funds, with the following improvements noted:

- Looking at accessibility and the needs of different members, including offering translation services and alternative identification options.
- Ensuring the use of compassionate and clear language.
- Having fact sheets and guides available.
- Adding online capability for death claims.
- Implementation of vulnerable member policy.
- The power of a phone call.

Member discussion noted the importance of improving practices to educate members around the importance of a binding nomination and the implications of this.

High-risk super switching

ASIC provided an overview of high-risk super switching, noting that in this business model, individuals are being encouraged, often via telemarketing, to switch their superannuation to specific platforms and invest with particular products. These products often involve high-risk investment schemes, which may be inappropriate for retirement purposes.

ASIC is actively taking action against those involved, including telemarketers, promoters, super trustees and financial advisors.

Attendees

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

	Obligations
ATO	Justin Micale, Superannuation and Employer Obligations
Actuaries Institute	Timothy Jenkins
Australian Financial Complaints Authority	Heather Gray (Co-chair)
Australian Prudential Regulation Authority	James Douglas
Australian Prudential Regulation Authority	Sarah Nicholson
Australian Securities and Investments Commission	Nicole Chew
Australian Securities and Investments Commission	Pippa Lane
Business Council of Australia	Stephen Kirchner
Chartered Accountants Australia and New Zealand	Tony Negline
COTA Australia	Patricia Sparrow
Financial Services Council	Kirsten Samuels
Gateway Network Governance Body	Michelle Bower
Grow Inc	Adam Gee
Law Council of Australia	Lisa Butler-Beatty
MUFG Pension & Retirement Solutions	Deborah Schembri
SMSF Association	Peter Burgess

Super Consumers Australia	Xavier O'Halloran
Super Members Council of Australia	Hannah Cole
The Association of Superannuation Funds of Australia	Sebastian Reinehr
The Tax Institute	Phil Broderick
Treasury	Brendan McKenna
Treasury	Ruth Moore

Guest attendees

Guest attendees list

Organisation	Attendee
Australian Securities and Investments Commission	Rhys Bollen

Apologies list

Apologies list

Organisation	Member
Australian Prudential Regulation Authority	Ian Beckett
The Association of Superannuation Funds of Australia	James Koval

Superannuation Industry Stewardship Group Key Messages 4 June 2025

Key messages from the Superannuation Industry Stewardship Group meeting 4 June 2025.

Published 7 August 2025

Superannuation regulators

Treasury

Treasury provided an update on several items of interest, including consultation on Payday Super and Delivering Better Financial Outcomes, Better Targeted Superannuation Concessions.

There will be future consultation on:

- member services
- best practice principles
- retirement phase reforms
- innovative income stream changes.

Australian Securities and Investments Commission

The Australian Securities and Investments Commission (ASIC) continues to focus on member services. ASIC will undertake a second review on a new theme and will follow up on progress made in death benefit claims handling.

The focus on retirement continues, including a thematic review of pre-retirement communications, a pulse check on progress implementing the Retirement Income Covenant with the Australian Prudential Regulation Authority (APRA) and upgrades to retirement content on Moneysmart.

Australian Prudential Regulation Authority

A joint APRA and ASIC letter relating to data collection and transparency issued to trustees in May 2025. It included a pulse check with a trustee survey to follow.

Data on the retirement phase will be released in June 2025.

In October 2024, APRA wrote to trustees about fund expenditure, noting that there will be supervisory attention on fund expenditure that does not appear to be in the best interest of members, or where there is questionable expenditure in high-risk categories. APRA will publish an update in due course.

Australian Financial Complaints Authority

From 1 July 2024 to 30 April 2025, superannuation complaints trended down. The Australian Financial Complaints Authority (AFCA) predicts there will be around 1,000 fewer complaints than the previous year. AFCA noted that improvements being made by funds are helping improve processes.

Complaints around scam activity in super are very low and funds have remediated when fraud has occurred.

There have been spikes of complaints around limited-service periods when funds undergo a change of administrator, successor fund transfer or merger. The group discussed how limited-service periods impact members, and whether funds need to ensure members are better informed of what it means for their account interactions.

Australian Taxation Office

The Australian Taxation Office (ATO) noted continued engagement with a broad range of stakeholders on Payday Super co-design. The ATO will provide regular updates to stewardship groups and stakeholder relationship groups.

While consultation paused for the caretaker period, the technical working group consultation has recommenced on key topics where a significant amount of external change is required, such as Single Touch Payroll and SuperStream.

The Payday Super Working Group provides overarching advice on the end-to-end administrative solution for Payday Super. Key outcomes,

including notes from the technical groups, are available online at Payday Super Working Group.

The ATO noted the Superannuation Industry Stewardship Group (SISG) would hold an out of session meeting on the ATO's Vulnerability Framework, which opens for public consultation from 12 June to 18 July 2025.

The ATO reminded fund members to be on the lookout for false information regarding changes to the superannuation preservation rules. Always consider the source of information, and if in doubt go to trusted sources such as:

- ato.gov.au
- super fund website
- registered tax agent
- licensed financial adviser.

Beware of websites that might try to harvest your personal information such as your tax file number, identity details or myGov login details.

Environmental scan – industry members

The SMSF Association shared recent priorities and areas of interest, including Division 296, the need for additional financial advisers, sustainability concerns regarding the compensation scheme of last resort, and a call for legislative certainty for wholesale investor rules for self-managed super funds (SMSFs).

Super Consumers Australia shared recent priorities and key focus areas including an upcoming report on First Nations super consumers, the need for better visibility of financial services provided by government agencies for consumers in the retirement phase, shining a spotlight on insurance in the sector, and developing strategies for people who do not actively engage with their super.

Shaping super

The Actuaries Institute shared an overview of Mercer's report *Shaping Super 2025*. The report examines the continuing evolution of the super landscape, and the ongoing consolidation set to significantly reshape the market.

Fraud and cyber security

Earlier this year, the super industry experienced a cyber-attack that compromised thousands of accounts and resulted in some members having their accounts accessed by cyber criminals.

Members discussed how the cyber-attack unfolded, the response from both regulators and industry, and opportunities for improvement to uplift controls and strengthen the system against future attacks.

Members noted the SISG has discussed cyber security and fraud several times over the past 12 months.

The National Cyber Security Coordinator explained the role of the National Office of Cyber Security (NOCS). NOCS leads whole-of-government cyber preparedness and response efforts, including responsibility for the full spectrum of situation response activities. NOCS was established on 1 May 2023 to ensure Australians are better protected, and businesses and critical infrastructure entities are cyber resilient.

If a cyber-attack is suspected, contact the Australian Cyber Security Centre and the Australian Signals Directorate. When engaging with the Australian Signals Directorate and relevant regulators, it is important to advise if assistance from NOCS is required to engage additional stakeholders or supporting incident coordination and consequence management.

Members were reminded to lodge a suspicious matter report to Australian Transaction Reports and Analysis Centre when there has been suspected fraud activity. This allows the ATO to monitor impacted accounts and take any protective measures necessary.

APRA will meet with industry following the recent cyber-attacks and APRA's concerns about persistent weaknesses in registrable superannuation entities licensee information security controls. The meeting will seek to share insights on cyber resilience, and development of industry wide protocols to be used in future cyber-attacks.

NOCS noted 3 steps Australians can take to improve their protection against fraud:

- use passphrases instead of passwords
- activate multi-factor authentication

- keep software updated on all devices.

Attendees

Attendees list

Organisation	Attendee
ATO	Usha Narain (Co-chair), Superannuation and Employer Obligations
ATO	Alastair Ramsay, Superannuation and Employer Obligations
Actuaries Institute	Timothy Jenkins
Australian Financial Complaints Authority	Heather Gray (Co-chair)
Australian Prudential Regulation Authority	James Douglas
Australian Prudential Regulation Authority	Sarah Nicholson
Australian Securities and Investments Commission	Nicole Chew
Australian Securities and Investments Commission	Pippa Lane
Business Council of Australia	Stephen Kirchner
Chartered Accountants Australia and New Zealand	Tony Negline
COTA Australia	Corey Irlam
Financial Services Council	Kirsten Samuels

Gateway Network Governance Body	Michelle Bower
Law Council of Australia	Tony Nemeć
MUFG Pension & Retirement Solutions	Deborah Schembri
SMSF Association	Peter Burgess
Super Consumers Australia	Xavier O'Halloran
Super Members Council of Australia	Hannah Cole
The Association of Superannuation Funds of Australia	Julian Cabarrus
The Tax Institute	Phil Broderick
Treasury	Benjamin Murphy
Treasury	Brendan McKenna
Treasury	Neena Pai
Treasury	Victoria Woolley

Guest attendees

Guest attendees list

Organisation	Attendee
ATO	Brendan Woolcock, Superannuation and Employer Obligations
Australian Prudential Regulation Authority	Alison Bliss

Australian Prudential Regulation Authority	Chanum Torres
Australian Securities and Investments Commission	Susan Wieczkiewicz
National Office of Cyber Security	Joe Smith
National Office of Cyber Security	Michelle McGuinness

Apologies list

Apologies list

Organisation	Member
ATO	Emma Rosenzweig, Superannuation and Employer Obligations
ATO	Justin Micale, Superannuation and Employer Obligations
Australian Prudential Regulation Authority	Ian Beckett
COTA Australia	Patricia Sparrow
Grow Inc	Adam Gee
The Association of Superannuation Funds of Australia	James Koval

Superannuation Industry Stewardship Group key messages

5 March 2025

Key topics discussed at the Superannuation Industry Stewardship Group meeting 5 March 2025.

Published 24 April 2025

Superannuation regulators

Treasury

Treasury updated the group on the following items of interest including Payday Super, member service standards and retirement income streams.

The group discussed confidentiality within consultation processes, how a cross-section of industry is selected for targeted consultation, and implications of an impending federal election on current policy development.

Australian Financial Complaints Authority

The Australian Financial Complaints Authority (AFCA) provided the following updates:

- From 1 July 2024 to 31 January 2025, superannuation complaints trended 30% lower than this time last year.
- The proportion of complaints relating to a delay in super fund complaint handling is currently 17%, showing significant improvement from previous results.

AFCA noted an emerging issue where trustees fail to retain member documentation such as member welcome letters or records of members opting in or out of insurance. The reasons cited for this behaviour include successor fund transfers or records only being held for a certain length of time. In the absence of legislation governing this, AFCA is asking for industry to lift standards on this matter, as the onus is on trustees to understand their members' entitlements.

Australian Prudential Regulation Authority

The Australian Prudential Regulation Authority (APRA) gave an overview of their discussion paper, which includes 8 consultation proposals to strengthen the prudential governance framework for banks, insurers and super trustees. Consultation on this paper opened on 6 March 2025, with submissions due 6 June 2025.

APRA continues its focus on expenditure by funds as outlined in its letter to industry of October 2024, with 2024 fund-level expenditure data released in January 2025. This data is being scrutinised for any expenditure that might not appear to be in the best financial interest of members.

Australian Securities and Investments Commission

The Australian Securities and Investments Commission (ASIC) updated the group on recent key priorities including:

- an ASIC issued a letter to super trustees urging them to strengthen their scam preparedness
- a discussion paper on Australia's evolving capital markets that is open for consideration. Super fund trustees are an important market participant and should consider providing feedback by the due date of 28 April 2025.
- ASIC continues to focus on member services, with work in progress on death benefit claims.

Australian Taxation Office

SMSF illegal early access estimate

In February 2025, the Australian Taxation Office (ATO) released the self-managed super fund (SMSF) illegal early access estimate for 2021–22. This allows the ATO to measure the size, scale, and trajectory of the risk of super being illegally withdrawn by trustees. It is estimated that:

- \$250.1 million of super was illegally withdrawn by trustees of SMSFs
- \$231.7 million was inappropriately accessed through prohibited loans.

Members noted the results of the 2022–23 illegal early estimate access in 2026 will indicate if current messaging is cutting through to

the market. The current cost of living crisis may have an impact on results.

For more information see [Latest estimate and trends for SMSF illegal early access](#).

Payday Super

The group discussed Payday Super consultation, noting that any consultation on items linked to the policy will need to stop once the federal election is announced. Consultation will continue for some limited items that are not linked to legislation.

A communication and transition approach is being developed for the decommissioning of the Small Business Super Clearing House (SBSCH) on 1 July 2026. Users of the SBSCH will need to transition to a commercial alternative for making super payments before 1 July 2026.

Environmental scan – industry members

Industry representatives provided updates and discussed emerging priorities and issues for their market, including:

- priorities for the upcoming federal election
- consideration for naming products in the retirement phase in a more customer friendly manner
- a request for consideration of the low-income super tax offset to be indexed
- the benefits of including proof of age cards into myGov as digital identification for older Australians, who may not, or no longer hold a driver's license
- the importance of mandatory customer service standards, with an observation that super fund websites offer very basic services for culturally and linguistically diverse clients.

Fraud and security update

ASIC wrote to super fund trustees on 30 January 2025 about the prevention of fraud and scams. There have also been talks with trustees about existing measures for responding to scams. Key points included:

- difficulties determining if someone is under the influence of a scammer, although some activities such as a lump sum withdrawal can be used as a prompt to investigate further
- the need for trustees to factor in the scam risk across all their member services, with a reminder that if you are not looking for scam activity you will not find it
- the importance of having security protocols in place for all methods of account interaction, to avoid scam actors exploiting a weakness in the system
- not underestimating the importance of good data and accurate reporting in helping detect potential scamming activities.
- regular communications with members can have a cumulative effect, if members are regularly warned of potential scam activity, it is more likely they will be able to detect a possible scam
- banks are traditionally better at detecting and preventing scam activity, the stronger bank defences get, fraudsters will look for other opportunities to exploit, including super.

Member discussion noted:

- APRA reminded members of the letter issued to trustees in May 2023 recommending the use of multi-factor authentication in member services.
- Industry noted the challenge in member services of balancing the speed of transactions whilst allowing sufficient time for security checks. There is investigation underway to how real time data can be leveraged, as well as improved identification processes arising from facial recognition technology.
- Both the Association of Superannuation Funds and Financial Services Council noted the standards developed for their members, outlining the minimum standard of fraud control and scam mitigation measures that should be deployed.
- The Council of the Aging (COTA) suggested targeted communications for older consumers to help reiterate the risk of fraud and scams.

Systemic impacts of 'big super'

The Connexus Institute gave an overview of the research paper *Systemic impacts of 'big super'*, which was released in January 2025. The paper investigates the impacts of the large and growing superannuation industry for the Australian economy, financial markets, and population from a wide range of perspectives.

Key takeaways included:

- Australia is much better off with a large superannuation industry than without it. Super has become the second largest form of household wealth behind housing.
- There are some areas of concern arising from the large superannuation industry, including exposure to economic and market risk, and under-developed operational infrastructure.
- Super is an unlikely source of systemic stress, however, could be a dampener or magnifier depending on the situation.

Mandatory member service standards

Treasury provided an update on the government's announcement to introduce mandatory and enforceable service standards for super, covering:

- the timely and compassionate handling of death benefits
- fair and efficient processing of insurance claims
- clear, respectful and accessible communications with members.

Consultation will occur across the 3 streams. COTA expressed interest in developing communications that provide more value to the member, as there is a conflict between communications in the consumer's interest, versus fund investment interest. Members will discuss this further out of session.

Member communications

ASIC provided the group with interim observations from its recent review of death benefit member resources on super fund websites. ASIC reviewed the websites of 22 super funds, with a mix of retail, industry and public sector funds included.

People making death benefit claims are usually under emotional and/or financial stress, making it especially important that trustees approach

these claims in a timely, clear and respectful manner

Findings noted:

- Death benefit information is challenging to find on super fund websites. Sometimes this information is located under insurance or is missing completely.
- Some websites contain basic information about death claims but lack additional details such as how to lodge a claim, or how long a claim can take.
- Content on how to make a binding nomination varies in quality. Some websites provide detailed information on how a binding nomination works, and why it is important. There are also some websites with case studies showing how a divorce, or birth of a child can impact this process.
- Information is sometimes hard to understand. It is important that this information is presented in clear and plain language.
- Support for First Nations clients is poorly communicated, with information only found by using a search function. Very few funds provide details on alternative proof of identification processes for First Nations beneficiaries.
- Not all trustees offer a translation or relay service for claims in languages other than English.

3-tier model in Super and Employer Obligations

The ATO gave an overview of the key concepts of the ATO's 3-tier framework, and how it applies in managing the ATO's key roles across Super and Employer Obligations.

The framework is a tool that supports a management view of performance and risk to inform priorities for investment. This complements traditional risk management approaches and improves the identification of connections and common themes to better address our key programs of work for super and employment obligations.

Attendees

Attendees list

Organisation	Member
ATO	Emma Rosenzweig (Co-chair), Superannuation and Employer Obligations
ATO	Justin Micale, Superannuation and Employer Obligations
Actuaries Institute	Timothy Jenkins
Australian Financial Complaints Authority	Heather Gray (Co-chair)
Australian Prudential Regulation Authority	James Douglas
Australian Prudential Regulation Authority	Sarah Nicholson
Australian Securities and Investments Commission	Jessica Spence
Australian Securities and Investments Commission	Pippa Lane
Business Council of Australia	Stephen Kirchner
Chartered Accountants Australia and New Zealand	Tony Negline
Financial Services Council	Kirsten Samuels
Gateway Network Governance Body	Michelle Bower
Grow Inc	Adam Gee
Law Council of Australia	Michael Mathieson
SMSF Association	Peter Burgess

The Association of Superannuation Funds of Australia	James Koval
The Tax Institute	Phil Broderick
Treasury	Neena Pai

Guest attendees

Guest attendees list

Organisation	Attendee
ATO	Brendan Woolcock, Superannuation and Employer Obligations
ATO	Christina Byrnes, Superannuation and Employer Obligations
Australian Prudential Regulation Authority	Chanum Torres
Australian Securities and Investments Commission	Julia Cakebread
Australian Securities and Investments Commission	Susan Wieczkiewicz
COTA Australia	Corey Irlam
MUFG Pension & Retirement Solutions	Hermoine Whitta
Super Consumers Australia	Katrina Ellis
Super Members Council of Australia	Hannah Cole
Super Members Council of Australia	Matt Linden

The Conexus Institute	David Bell
The Conexus Institute	Geoff Warren
Treasury	James Thomson
Treasury	Lachlan Alvey

Apologies

Apologies list

Organisation	Member
Australian Prudential Regulation Authority	Ian Beckett
COTA Australia	Patricia Sparrow
MUFG Pension & Retirement Solutions	Deborah Schembri
Super Consumers Australia	Xavier O'Halloran
Super Members Council of Australia	Emily Millane
Treasury	Victoria Woolley

QC 104315

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