KPMG

Securing Australians' Superannuation

KPMG submission

KPMG Australia, 3 November 2023

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Contents

Executive summary

As a leading professional services firm, KPMG Australia (KPMG) is committed to meeting the requirements of all our stakeholders – not only the organisations we audit and advise, but also employees, governments, regulators and the wider community. KPMG strives to contribute to debate that seeks to develop a strong and prosperous economy.

KPMG agrees with a number of the suggestions put forward in the Consultation paper and we provide some additional suggestions. We also note a few areas where there would be benefit for further clarification.

KPMG welcomes Treasury's Consultation *Securing Australians' Superannuation* and the opportunity to provide input on implementing payday superannuation and a redesigned compliance framework to ensure employers pay their super obligations as close as possible to payday It is very important that employees receive timely Superannuation Guarantee (**SG**) contributions.

KPMG's expertise in assisting our clients with payroll and superannuation compliance over a number of years has informed us in developing this response to the Consultation. Our response is also informed by KPMG as an employer of over 10,000 people.

KPMG has also advocated for adding SG contributions to the Commonwealth Carer Payment in our paper *Towards gender equity in retirement* and on Paid Parental Leave as set out in *A better system of paid parental leave*. The paper sets out that since the Commonwealth pays Paid Parental Leave to eligible workers – and compulsory super contributions rightly form part of remuneration – then it follows logically that the Commonwealth should make Superannuation Guarantee contributions under its PPL scheme.

In relation to increasing the payment frequency of the SG, we recommend the government consider a reasonable timeframe from the date salaries and wages are paid to the date the SG is due. This will enable and allow employers sufficient time to ensure that their reporting obligations are aligned with timely payment, as well as reasonable time to process and manage administrative delays in making SG payments.

As an administrative measure, changing the SG payment frequency and consolidating payment contributions may be beneficial if moved to a monthly schedule. KPMG recommends the government undertake some additional modelling and prepare a regulatory impact statement to ensure the cost of facilitating additional SG payments (where an employer operates multiple pay-runs) does not exceed the benefit.

KPMG also recommends the government consider additional oversight from the Australian Taxation Office (**ATO**) to payment intermediaries (e.g. clearing houses) to ensure they apply the SG payment timely and accordingly.

We support any initiatives to align the payment of superannuation with other existing payroll and employment tax measures for those workers who are paid via overseas employers, e.g., STP reporting concessions and payroll tax exemptions.

In responding to Treasury's Consultation paper, KPMG has not sought to answer all the questions put forward. KPMG has provided commentary in line with the general themes that these questions have covered.

KPMG looks forward to continuing to contribute to strengthening Australia's superannuation system and helping deliver a more dignified retirement for Australian workers.

Should you wish to discuss these issues or proposals further, please do not hesitate to reach out.

Yours sincerely,

David Sofrà

National Partner in Charge,
Workforce & Innovation

KPMG Australia

Background

About KPMG

KPMG is a global organisation of independent professional firms, providing a full range of services to organisations across a wide range of industries, governments and not-for-profit sectors. We operate in 146 countries and territories and have more than 227,000 people working in member firms around the world. In Australia, KPMG has a long tradition of professionalism and integrity combined with our dynamic approach to advising clients in a digital-driven world.

About Workforce Advisory

KPMG Payroll Connect offers holistic payroll governance, strategy and optimisation solutions that combine the expertise of our industry-leading employment tax and payroll specialists with payroll digital platforms to enable organisations to not only help achieve accurate and compliant payroll with increased automation, but also access a broad range of advice on how to enhance every element of the organisations' payroll strategy and operations.

KPMG Payroll Connect tailored service relieves organisations of the reputational risk associated with fair work and payroll compliance as well as the administrative burden of payroll processing and the cost of navigating the impact of regulatory change as it happens.

Section 1:
KPMG recommendations

RECOMMENDATION 1:

If the existing 'Due date model' were to continue, it would be beneficial to have a date by which all SG contributions had to be submitted, for example, by the 6th of the following month. This would at least give employers time to aggregate all pay cycles and correct any anomalies, thus lowering the cost of compliance through multiple SG payment runs and also provide businesses with sufficient time to manage their cash flows.

RECOMMENDATION 2:

KPMG acknowledges that the proposed changes may require organisations to examine and uplift their governance processes in relation to superannuation reporting, which includes accelerating their investment in automation, and improvements in their procedures and controls. Consideration should be given to the timeframe required for these reforms to be implemented successfully and provide employers with an adequate testing environment prior to 1 July 2026.

RECOMMENDATION 3:

KPMG is supportive of the requirement for financial intermediaries to be overseen in order to ensure payment due dates are met in view of the shortened timeframe. This is important given financial intermediaries hold the monies in trust and have an obligation to ensure that the employer contributions reach the employee's superannuation funds as timely as possible.

RECOMMENDATION 4:

Depending on what is determined in respect of the two proposed models ('employer payment' or 'due date') and the definition of 'payday', KPMG suggests that an ATO reconciliation should take place on a pre-determined number of working days after the payday (for example 5),. This option will provide a more flexible approach for businesses and will ensure that there is a standardised and known time period from the date payment of salary and wages is made (and therefore when superannuation is due) to when the ATO will perform their reconciliation.

RECOMMENDATION 5:

The Consultation paper refers to a 'nudge' system, whereby the ATO will reach out to an employer where superannuation contributions are not with the fund, in full, by the due date or paid on payday. In practice, this will need further design, specifically in relation to the number of 'nudges' that will be provided to employers, the frequency and the form (i.e., paper or via the business portal).

RECOMMENDATION 6:

KPMG welcomes the suggestion to allow for Late Payment Offsets (**LPOs**) to be applied to periods greater than 12 months after the contributions are made and this will afford employers greater flexibility. Practically this will present some administrative challenges given that over time this may be difficult to track, reconcile and document.

RECOMMENDATION 7:

The Consultation paper also contemplates giving the ATO greater flexibility in being able to remit the SG contributions. We agree that in limited and exceptional circumstances, the ATO should be given the ability to remit the SG contributions. This will require additional guidance to be published and a detailed mechanism for employers to submit applications.

RECOMMENDATION 8:

We also propose that the ATO consider an 'amnesty' which allows for SG contributions to be remitted in an interim period once payday superannuation goes 'live'.

RECOMMENDATION 9:

If the nominal interest rate concept were to be retained, KPMG recommends that the nominal interest rate is changed to a floating rate (and premium) to make it a reflection of the market rate. Additionally, we would recommend that Treasury share some data around the cost of compliance. This will ensure the administration fee is a true reflection of administrative costs.

RECOMMENDATION 10:

In relation to SG contributions for the 2026-2027 financial year, KPMG recommends that for the transitional year (2026), a grace period should be applied for the SG periods for quarter 4.

RECOMMENDATION 11:

Historically the calculation and application of the Maximum Contributions Base (MCB) has been performed on a quarterly basis. However, with the introduction of Payday super, there may no longer be a fixed due date for employers for the MCB to be aligned to. To address this, KPMG recommends having weekly, fortnightly and monthly tables, similar to those that currently exist for Pay As You Go (PAYG) withholding.

RECOMMENDATION 12:

KPMG recommends that concessions should be made available for the payment of SG into a superannuation fund for inbound assignees on shadow payroll arrangements. As the base salary and other remuneration is paid by an offshore entity, the appropriate calculation to determine Australian SG payments can only be made at the same time as the processing of the shadow payroll arrangements to account for Tax and Superannuation. It would be appropriate to allow employers to pay superannuation into an Australian superfund one month in arrears of the Pay Date and the ability to use reasonable estimates, similar to the concessions available for the Single Touch Payroll (STP) reporting of income.

RECOMMENDATION 13:

To ensure that the operation of the SG system does not capture situations that may not have been envisaged when the original legislation was drafted, we recommend that there is another exclusion to be included in Section 27 of the *Superannuation Administration Guarantee Act 1992* (SGAA) so that an employer is not required to pay SG where the employee's salary and wages are exempt from taxation in Australia for work done in Australia. This will ensure that there is no unnecessary burden for the foreign employer to comply with the Australian SG legislation where there is no equal burden to operate payroll to meet payroll compliance and PAYG withholding obligations.

Section 2:
KPMG insights

KPMG insights

1.Increasing the SG payment frequency

KPMG acknowledges that from a business operations perspective, the proposed change to increase the payment frequency of the SG may require an uplift in governance processes for superannuation reporting, which includes accelerating their investment in automation, and improvements in their procedures and controls. These factors are equally important for long-term sustainability and for future-proofing an organisation’s payroll function. However, implementing these changes takes time. Hence, the ATO would need to consider the following key business implementation issues as part of the policy design:

Increase in administrative burden – changing the frequency of superannuation payments to fall in line with the day wages and salaries are paid may impose a substantial administrative burden on businesses that process payrolls on a weekly or fortnightly basis, or those who perform out-of-cycle pay runs more frequently. This is due to the number of administrative tasks involved in managing super contributions, which could include, among others, requesting a ‘standard choice form’ for new employees; requesting stapled fund information from the ATO (where applicable); resolving issues on super refunds or issues with superannuation clearing houses; and re-banking failed super payments.

Increase in administrative cost could affect employees’ retirement funds – more frequent SG payments may end up as increased administration fees for employees. For example, weekly payroll for casual employees is common, and additional SG payments may have an adverse impact given that the admin fee is deducted from individual (member) accounts. The quantum of fees depends on the profile of the fund, arrangements and how they are deducted.

Investment in business transformation including automation – while the technology exists to allow SuperStream reporting to be fully integrated between the payroll system and the superannuation clearing house, several organisations still perform SuperStream reporting manually. In fact, several larger businesses devote resources completely to super reporting, payment, and reconciliations. As a result, businesses will need to source the required funds to invest in the necessary technology and business process changes in order to meet the demands of the increased volume of super payment transactions, as well as the associated compliance obligations.

Cash flow management particularly for small businesses – more frequent superannuation payments will require employers to carefully plan their cash flows as employers will no longer have an option to defer the payment until the quarterly due date. This could create financial challenges, particularly for small businesses and those with irregular streams of income.

Recognising the above, we share our views on the following:

The proposed 'Employer payment model,' which requires employers to pay SG contribution on ‘payday’ may appear to be less onerous on employers as the SG charge is based on the date that the employers need to make the SG payment, regardless of the timing of receipt of superannuation contributions by an employee’s superannuation fund. While this model incentivizes employers to meet the due date by which they must make the payment, it appears to abdicate employers' responsibility to ensure that the payment reaches the employee's superannuation fund on time, which runs counter to the principal objective of the policy change. Furthermore, requiring a new reporting system for employers only to accommodate the ‘Employer payment model’ would not only add to the cost of business transformation and change as noted above, but would also impose an unwarranted additional compliance burden on employers, considering that under the STP 2 regime, businesses already provide granular payroll information to the ATO.

The proposed 'Due date model,' which is the current model in which an employer becomes liable to pay the SG charge if their employee's superannuation contribution is not with their fund by a specified due date, is continuing to protect the welfare of the employees by providing accountability to the employers to ensure that the payment reaches the employee's superannuation fund by the set 'due date'. However, in order to avoid unfairly penalising employers for circumstances beyond their control when making an SG payment, the new policy needs to establish an appropriate 'due date' that allows for reasonable processing and administrative delays in transferring funds.

The Consultation provides that a feasible due date for superannuation contributions to reach the fund would be between 8 to 13 days after payday. Even if this extends up to 15 days after payday, KPMG considers this reasonable because this timeframe allows employers with weekly pay runs or more frequent out-of-cycle pay runs to consolidate their super contributions and, at the very least, reduce the volume of SG payment transactions in order to help contain the administrative cost of payment processing. Also, this timeframe provides small businesses with the much-needed time to help manage their cash flows.

In relation to the question about whether there should be a standardised due date, it would be beneficial to have a date by which all SG contributions have to be submitted, say by the 6th of the following month. This would give employees time to aggregate all pay cycles and fix any anomalies, thus lowering the cost of compliance through multiple SG payment runs. For example, PAYG payment is dependent on when wages are paid, but is not on the same day. Payroll Tax is paid by the 6th of the following month, so this could be a model for SG payments.

The Consultation makes reference to requiring financial intermediaries to be regulated in order to ensure payment due dates are met in view of the shortened payment timeframe.

RECOMMENDATION 1:

If the existing ‘Due date model’ were to continue, it would be beneficial to have a date by which all SG contributions had to be submitted, say by the 6th of the following month. This would at least give employers time to aggregate all pay cycles and fix any anomalies, thus lowering the cost of compliance through multiple SG payment runs and also provide businesses with sufficient time to manage their cash flows.

RECOMMENDATION 2:

KPMG acknowledges that the proposed changes may require organisations to examine and uplift their governance processes in relation to superannuation reporting, which includes accelerating their investment in automation, and improvements in their procedures and controls. Consideration should be given to the timeframe required for these reforms to be implemented successfully and provide employers with an adequate testing environment prior to 1 July 2026.

RECOMMENDATION 3:

KPMG is supportive of the requirement for financial intermediaries to be overseen in order to ensure payment due dates are met in view of the shortened timeframe. This is important given financial intermediaries hold the monies in trust and have an obligation to ensure that the employer contributions reach the employee’s superannuation funds as timely as possible.

2. SG charge assessment timeframe

The Consultation paper raised a question in relation to the appropriate timeframe or frequency of the reconciliation.

RECOMMENDATION 4:

Depending on what is determined in respect of the two proposed models (‘employer payment’ or ‘due date’) and the definition of ‘payday’, KPMG suggests that an ATO reconciliation should take place on a pre-determined number of working days after the payday (for example 5),. This option will provide a more flexible approach for businesses and will ensure that there is a standardised and known time period from the date payment of salary and wages is made (and therefore when superannuation is due) to when the ATO will perform their reconciliation.

3. Tax deductibility and compliance

The Consultation paper makes reference to a ‘nudge’ system, whereby the ATO will reach out to an employer where superannuation contributions are not with the fund, in full, by the due date or paid on payday.

Throughout this process, the ATO has contemplated introducing a reconciliation system, using data available (e.g. STP 2.0 and funds receipted data from superannuation funds). This is a welcome suggestion as it will alleviate some of the administrative burden on the employer. In these circumstances, the ATO would provide the reconciliation data to the employer prior to issuing an automated SG contribution statement.

The LPO and carry forward of late payments should remain a feature of the SG compliance system. Currently, LPOs can only be applied within 12 months after the contributions are made, with the carry forward tax deductible in the financial year it is received by the fund.

RECOMMENDATION 5:

The Consultation paper refers to a 'nudge' system, whereby the ATO will reach out to an employer where superannuation contributions are not with the fund, in full, by the due date or paid on payday. In practice, this will need further design, specifically in relation to the number of 'nudges' that will be provided to employers, the frequency and the form (i.e., paper or via the business portal).

RECOMMENDATION 6:

KPMG welcomes the suggestion to allow for LPOs to be applied to periods greater than 12 months after the contributions are made and this will afford employers with greater flexibility. Practically this will present some administrative challenges given that over time this may be difficult to track, reconcile and document.

4. SG charge calculation

The Consultation paper notes that the non-deductibility of the SG contribution can be significant and raises questions in relation to whether the SG contribution should be tax deductible under certain circumstances.

KPMG agrees that in certain circumstances, the application of an LPO or payment of SG contribution should retain its tax deductibility. For example, circumstances where there were reporting or financial system errors, or if payments were received late due to a change of employee fund details that were not communicated to the employer.

Practically, this may mean that all applications for a tax-deduction are required to be made in writing via a voluntary disclosure process, which outlines the reasons under which the deduction should be allowed. The ATO may also consider providing a practical compliance guide or similar companion, which sets out the circumstances when a tax deduction may be allowed and the prescriptive steps ATO officers are required to follow when determining the application (akin to the guidance set out in PS LA 2021/3).

RECOMMENDATION 7:

The Consultation paper also contemplates giving the ATO greater flexibility in being able to remit the SG contributions. We agree that in limited and exceptional circumstances, the ATO should be given the ability to remit the SG contributions. This will require additional guidance to be published and a detailed mechanism for employers to submit applications.

RECOMMENDATION 8:

We also propose that the ATO consider an 'amnesty' which allows for SG contributions to be remitted in an interim period once payday superannuation goes 'live'.

5. ATO flexibility in SG charge remission

Rather than a nominal interest rate to compensate for the loss of potential earnings, perhaps a benchmark investment/earnings percentage could be released annually which would be used to calculate the nominal earnings required to be paid to compensate the employee. A sample or snapshot of the performance of the funds with the most members (and therefore representing the majority of the Australian population) could be used to determine the rate, similar to the way in which an index fund or exchange-traded fund operates.

If there were a genuine intention to comply, but there were outside factors that created a situation of non-compliance (i.e., the clearing house did not remit the superannuation to a complying superfund on time), then the SG charge should be tax deductible. This could be applied for on a case by case basis via a written submission and a new practice statement should be drafted to provide guidance on what circumstances the ATO would consider as sufficient to warrant tax deductibility.

More generally, the current practice statement (currently PS LA 2021/3) should be updated.

RECOMMENDATION 9:

If the nominal interest rate concept were to be retained, KPMG recommends that the nominal interest rate is changed to a floating rate (and premium) to make it a reflection of the market rate. Additionally, we would recommend that Treasury share some data around the cost of compliance. This will ensure the administration fee is a true reflection of administrative costs.

6. SG contributions for the 2026-2027 financial year

The Consultation paper makes reference to a number of suggested measures in relation to the 2026-2027 financial year. KPMG acknowledges that the regimes framework in its current format, is unlikely to be fit for purpose from 1 July 2026 for the following reasons:

A. The SG contribution is imposed where there are shortfalls or late payments of superannuation on a quarterly basis;

B. SG contribution statements are required to be submitted for each shortfall quarter, and the calculation of shortfall amounts, interest and the administrative penalty are all determined on a quarterly basis; and

C. The current way in which the legislation is written means that shortfalls or late payments can only be calculated with reference to the quarter.

RECOMMENDATION 10:

In relation to SG contributions for the 2026-2027 financial year, KPMG recommends that for the transitional year (2026), a grace period should be applied for the SG periods for quarter 4.

7. Maximum base calculations

Historically, the calculation and application of the Maximum Contributions Base (MCB) has been performed on a quarterly basis. However, with the introduction of Payday super, there may no longer be a fixed due date for employers for the MCB to be aligned to.

RECOMMENDATION 11:

Historically the calculation and application of the MCB has been performed on a quarterly basis. However, with the introduction of Payday super, there may no longer be a fixed due date for employers for the MCB to be aligned to. To address this, KPMG recommends having weekly, fortnightly and monthly tables, similar to those that currently exist for PAYG withholding.

8. Self-managed super funds

One of the many responsibilities SMSF Trustees are required to undertake includes the receipt of employer SG contributions. The annual reporting cycle to the ATO required by SMSFs does not provide the same level of detail of whether an employee's SG entitlements are being met by their employer. Nevertheless, due to the nature of the SMSF, SMSF members have a current level of oversight that will enable them to identify anomalies in relation to the non-payment of SG contributions and are able to report unpaid superannuation contributions to the ATO. Therefore, we do not see a need to change the reporting framework for SMSFs. Any change to the SMSF reporting framework would increase the administrative and regulatory burden on SMSF Trustees without benefit. Similarly, we would not anticipate any changes required for SMSF members due to the close nature of SMSF relationships.

9. Other issues – shadow payroll payday super concessions

Many multinational companies have a global workforce and employees may be sent to Australia for a temporary period to work in Australia to complete a project or to work for an affiliated entity. These employees retain their home country employment contract and continue to be paid from their home country payroll for the period of their temporary assignment to Australia. Part of the reason for remaining on home country payroll would be to enable these employees to remain in home country social security arrangements and receive normal home country benefits while on assignment to Australia.

A shadow payroll arrangement is a method of calculating the appropriate tax and social security liabilities in the host location (e.g., Australia) to be submitted to the ATO while the employee continues to be paid from the home country payroll.

With the introduction of STP reporting, the ATO has acknowledged that there are many factors in operating shadow payroll arrangements that make it difficult to report through STP on or before the date an amount is paid to an inbound assignee who is paid from an overseas payroll. These factors include delays in receiving the information from an overseas payroll, currency conversion and the requirement for additional calculations to implement tax equalisation arrangements. The ATO has therefore allowed concessions for employers who have inbound assignees into Australia to report to the ATO at any time before the end of the calendar month following the date a payment is made to the employee. In addition, reasonable estimates may be used for the purposes of STP reporting of income and tax and a reconciliation is required before the year-end finalization.

Where a reasonable estimate is used to calculate SG obligations and to report to the ATO, the employer should be provided with the flexibility to perform a quarterly reconciliation to pay over to the superfund any required 'top up contributions' to comply with the existing SG legislation.

It is noted that to qualify for the STP reporting concessions, the following conditions must be met by the inbound assignee:

- They are employed by an offshore entity - for example, an entity that is non-resident for Australian taxation purposes.
- They are seconded to Australia.
- Have all, or part, of their base salary and other remuneration paid by an offshore entity.
- They are maintained in Australia using a 'shadow payroll arrangement'. This is a notional payroll in Australia for the purposes of paying Australian PAYG withholding and Superannuation Guarantee obligations.

The inbound assignee population are typically foreign nationals on assignment to Australia and are considered 'temporary residents' of Australia for tax purposes. Temporary residents of Australia are able to withdraw their Australian superannuation on departure from Australia under the Departing Australian Superannuation Payment (DASP) process. Therefore, we do not anticipate that the concession suggested for inbound assignees for PayDay superannuation would conflict with the broader policy intention of securing superannuation for Australians. Making employers comply with PayDay Super for inbound assignees on shadow payroll arrangements will be administratively burdensome given the concessions that exist for STP reporting of tax and superannuation.

RECOMMENDATION 12:

To ensure that the operation of the SG system does not capture situations that may not have been envisaged when the original legislation was drafted, we recommend that there is another exclusion to be included in Section 27 of the SGAA so that an employer is not required to pay SG where the employee's salary and wages are exempt from taxation in Australia for work done in Australia. This will ensure that there is no unnecessary burden for the foreign employer to comply with the Australian SG legislation where there is no equal burden to operate payroll to meet payroll compliance and PAYG withholding obligations.

10. Business travellers into Australia

The core purpose of the introduction of the SGAA was to mandate employers to contribute a fixed percentage of an employee's earnings into an Australian superfund to provide for retirement for Australians. Superannuation savings are supported by tax concessions that encourage people to save, and investments must be preserved until retirement (except in exceptional circumstances).

There are exemptions outlined under Section 27 of the SGAA which operates to provide an exemption for an employer from making superannuation contributions with respect to an employee under specific circumstances. These exclusions are limited to the situations outlined below:

(b) salary or wages paid to an employee who is not a resident of Australia for work done outside Australia (except to the extent that the salary or wages relate to employment covered by a certificate under section 15C);

(c) salary or wages paid by an employer who is not a resident of Australia to an employee who is a resident of Australia for work done outside Australia;(ca) salary or wages paid by an employer to an employee who is not a resident of Australia for work done in the Joint Petroleum Development Area (within the meaning of the Petroleum (Timor Sea Treaty) Act 2003);

(d) salary or wages paid to an employee who is a prescribed employee for the purposes of this paragraph*;*

(e) salary or wages prescribed for the purposes of this paragraph.

The result of the narrow range of exclusions available is that many foreign employers are not exempt from the technical requirement of having to pay Australian superannuation contributions with respect to short-term business travellers into Australia. This is the case even where there is an exemption under a relevant Double Tax Agreement (DTA), between Australia and the country with which the business traveller has come from, that operates to exclude the taxability of workdays in Australia under the 'short-term visitor exemption'. Please refer to Article 15-Taxation of Employment income under the OECD Model Tax Convention on Income and on Capital.

Following the COVID-19 pandemic, we have also witnessed an increase in remote working arrangements, whereby foreign employers are permitting their employees to work in Australia for a temporary period for personal reasons. Whilst their employment income may be exempt from taxation in Australia due to the satisfaction of conditions under the relevant DTA, there is no similar exemption from the application of SG.

Practicalities have also made such technical compliance unable to be administered by foreign employers as all Superannuation Guarantee contributions are required to be paid via SuperStream or through registration with ATO's Small Business Superannuation Clearing House. A foreign employer cannot be easily set up to comply with such obligations.

RECOMMENDATION 13:

To ensure that the operation of the SG system does not capture situations that may not have been envisaged when the original legislation was drafted, we recommend another exclusion be included in Section 27 of the *Superannuation Administration Guarantee Act 1992* so that an employer is not required to pay SG where the employee's salary and wages are exempt from taxation in Australia for work done in Australia. This will ensure that there is no unnecessary burden for the foreign employer to comply with the Australian SG legislation where there is no equal burden to operate payroll to meet payroll compliance and PAYG withholding obligations.

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