

## Exposure Draft -

# Payslip Reporting of Superannuation Contributions

The Manager  
Contributions and Accumulations Unit  
Personal and Retirement Income Division  
The Treasury  
Langton Crescent  
PARKES ACT 2600

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### Exposure Draft - Payslip Reporting of Superannuation Contributions

I wish to lodge the following submission on behalf of Attaché Software Australia Pty Ltd. Attaché are a developer of accounting and payroll software servicing the small to medium size business sector. Our submission is as follows: -

1. As a software development company, we have no objection to the addition of information on the pay advice to show the anticipated date on which the superannuation amounts detailed on the pay advice will be sent to the superannuation fund or funds.
2. The document is not clear as to whether the reporting requirements are in respect of only Superannuation Guarantee (SG) contributions or apply to all amounts of superannuation included on an employee's pay advice. A clear statement of the scope of the requirement needs to be included.
3. Should the payment date shown on the pay advice be the date on which the employer makes a payment to the superannuation fund/clearing house, or the date on which it is anticipated that the superannuation fund will receive the contributions? There can be delays in the transit of funds if these are sent by cheque. Alternatively a clearing house may hold onto the superannuation payment for a number of days before forwarding the contributions to the superannuation fund.
4. Assuming that the payment date for all superannuation amounts needs to be reported, an issues arises where different types of superannuation are paid at different times. It is a common practice for some of our users to pay Salary Sacrifice (SS) contributions on a monthly basis whilst only paying Superannuation Guarantee amounts away quarterly. In this case, does the reported date simply have to reflect the later of

the dates by which all the superannuation contributions have been paid? This information needs to be clearly stated in the legislation.

5. We are concerned that this measure is being introduced in a way that allows for the information that needs to be reported on the pay advice to be changed by regulation. This means that the information required can be updated without an amendment to the SIS act being passed through parliament meaning that it will attract less scrutiny. There have been proposals that the actual payment date of superannuation should be shown on the pay advice. This proposal would be much more difficult for software developers to implement as the payment process for superannuation is separate from payroll (ie the payment of superannuation is an Accounts Payable process which may be handled by a different department in the employer's business). The Exposure Draft shows the Cost/Compliance impact as being Minimal/Medium - this would not be the case if actual payments have to be shown on the pay advice. If the actual payment details need to be advised to the employee, this would be better handled by the superannuation fund as they are the ones who know when payment was received.

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