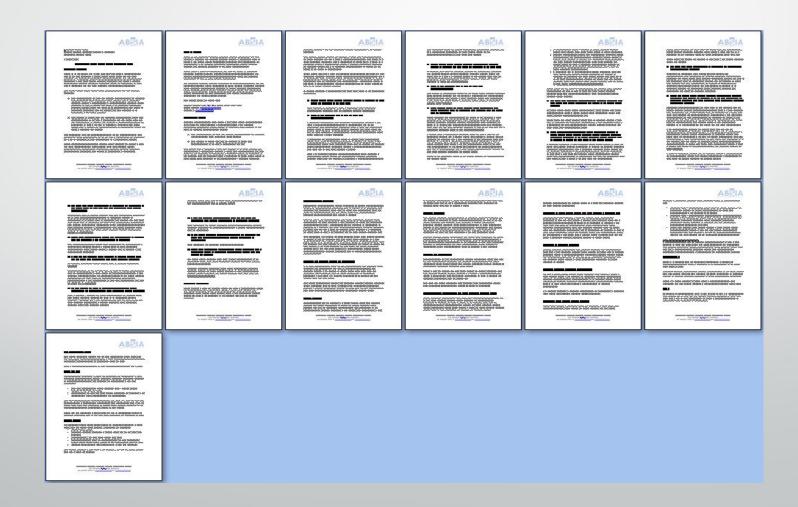


Single Touch Payroll

The ABSIA Submission



The ABSIA Submission





What Was In Our Submission

Executive Summary

Who is ABSIA

Submission Details

- Responses to the questions in the consultation document
- Additional comments



Submission Details

- Software developers have been aware of the proposal for at least two years following a presentation at the SDCG meeting in March 2013
 - i. TFN Dec/Choice of Super into a single service
 - ii. Payroll data and PAYG/Super payment on finalising payrun
- Government is saying this is a red-tape reduction measure
- If Data and Payments are separated it has the potential to be the opposite if not handled correctly
- Significant workload for developers with little ability to re-coup the cost



- Consultation document contained 16 questions the following are a few excerpts
- Red-tape reduction depends on the final scope of STP. Some annual processes will be eliminated (eg Payment Summaries) and replaced with a weekly process. If data and payments are separated there are other issues eg SuperStream relies on a Payment Reference Number (PRN) for matching.
- Size and cost of red-tape reduction depends on scope and cash flow



- Cash flow impact depends on the nature of the business
- Currently obligations are paid when due and a business is entitled to use the cash in the meantime
- A cash flow reduction may mean lower stock leading to fewer sales
- Inability to make benefit of an early payment discount
- Effect on Labour Hire firms who are paid after the event and may now have to fund an additional 40% - maybe through debt financing
- It does not appear that the impact on cash flow has been fully analysed



- STP should include data for all employee obligations.
- For on-boarding a new employee, assist the employer with as much data as possible.
- Assistance with cash flow allow a business to apply for short term funding from the government to phase in the cash flow impacts over a 5 year period eg 90% year 1, 70% year 2 etc or delay GST payment.



- Employee On-boarding provide the employer with all details known about the employee including TFN, Super Fund, Address, Bank details, Next of Kin etc (some subject to employee's agreement).
- Choice of Fund a clear choice is required on day one. Most employees will have an existing fund. If an employee is new to the workforce, use default fund or send super to the ATO who pass it on once an employee has made an informed decision. This avoids a hasty/temporary solution and will result in red-tape reduction.



- Notifications to other agencies (eg DHS) must be handled automatically by the ATO.
- Oblige a super fund to accept a contribution after the death of an employee (or send all such contributions to the ATO)
- ATO Commissioner should always have discretion on penalties
- Uncertainty over AS4 standards used for SuperStream and SBR may be costly



- Very small businesses may have to acquire payroll software they may find this a benefit
- Costs for software developers in training and implementing STP for their clients
- No employer should be made exempt from Single Touch Payroll



Additional Comments from ABSIA

- SG threshold of \$450 eliminate and give one-off \$1,000 threshold.
- How to deal with negative adjustments.
- Payroll Bureaus effectively providing financing for employers may now have a much higher cost burden.
- Has monthly reporting been considered? Currently in use in New Zealand,
 Fiji and other countries.



- Employers with multiple pay frequencies may find STP a greater challenge. All employees may be moved to monthly pays.
- Pay runs outside of the normal cycle.
- The Small Business Clearing House will need to accept a data file for input another expense for software developers.
- There needs to be a procedure for employers to cut over to STP part way through a financial year. May need YTD figures within reporting.



- Rounding of reported amounts current truncation of reported amounts on a payment summary of no consequence but not on 52 weekly pays.
- Payment Summary reporting requirements please review to see what is actually needed for STP.
- Eliminate part-year payment summaries.
- Dual model it has been suggested that two systems are built, one including payments and one excluding payments. More expense for developers!



- Payments made outside of payroll software
- Bureau paying staff, employers pays PAYG and Superannuation
- Employer with different payroll and accounting systems
- ERP systems where the payroll and accounting systems do not interface.



- SuperStream 3 payroll providers currently certified and in production
- SuperStream2 MIG changes due to be implemented in 2016. Significant changes including new message types and new and changed data elements
- SBR2 low take up
- Digital Signature/Declaration request from Tax Practitioners Board.
- eBMS₃ AS₄ two versions of ebMS₃.o used for SuperStream and SBR₂
- Friday 27th March red letter day



Summary

Single Touch Payroll consists of :-

STP

SBR₂

SuperStream2

Digital signatures/declaration from TPB

Multiple AS₄ standards

July 2016 is not realistic – maybe a recipe for disaster



Suggestions from 12th March 2015

- Now Initiate ABSIA plan to develop an open source AS4 client
- July 2016 Implement employee on-boarding, SuperStream MIG2 and SBR2 with an open source AS4 client
- July 2017 Implement PAYG reporting and TPB certification
- July 2018 Implement Superannuation payments



Questions and Comments

Please hold for the Q&A session