

## ATO online super account name display

AIST is responding to ATO's call for submissions about changing the ATO Online services super fund 'account name' display from 'legal entity name' to 'product name'.

### In brief:

AIST supports the display of product names in ATO Online, but recommends changing the current listings of product names in the Fund Validation Service to improve fund name recognition by members. However, resolution of this issue does not address AIST's wider concerns about the proposed online choice of fund form.

*The Australian Institute of Superannuation Trustees is a national not-for-profit organisation whose membership consists of the trustee directors and staff of industry, corporate and public-sector funds.*

*As the principal advocate and peak representative body for the \$700 billion profit-to-members superannuation sector, AIST plays a key role in policy development and is a leading provider of research.*

*AIST provides professional training and support for trustees and fund staff to help them meet the challenges of managing superannuation funds and advancing the interests of their fund members. Each year, AIST hosts the Conference of Major Superannuation Funds (CMSF), in addition to numerous other industry conferences and events.*

### Change to product name supported

AIST reaffirms our support for the change suggested by the ATO, and has received representations from AIST member superannuation funds supporting the change.

In the AIST response to online choice of fund design consultation paper<sup>1</sup>, we made the following recommendation to the ATO:

*For the ATO to review the names of the super funds that will be listed online, to ensure they reflect the names by which funds are commonly known, and for the ATO consider the display of super fund logos beside their name to help new employees recognise their super funds.*

AIST continues to advocate for these changes to be made on the following basis, and in a two stage process:

1. Change 'account name' display from 'legal entity name' to 'product name'.
2. Include the logo of the relevant superannuation fund alongside the product name.

---

<sup>1</sup> [http://www.aist.asn.au/media/1034974/20170725\\_submission\\_ato\\_choiceform\\_v1\\_0\\_final.pdf](http://www.aist.asn.au/media/1034974/20170725_submission_ato_choiceform_v1_0_final.pdf)

The Productivity Commission has undertaken a survey of super fund member behaviour, including their past and present experiences and attitudes towards super, and how they make their decisions. In their survey report<sup>2</sup>, it is suggested that recognition of a fund's brand may be a factor in the choice of fund made by survey respondents (although this was not specifically observed in the survey).

It is a truism that a fund member will not recognise their fund if the name given is not one that is not widely or publicly displayed in the super fund's own materials. For example, Cbus members are unlikely to recognise 'United Super Pty. Ltd.' or 'Construction and Building Unions Superannuation' as being Cbus, and would expect that it be named on a consistent basis in most publicly accessible documents. It is therefore appropriate for the product name for the Cbus default fund to be shown on the ATO Online super account name display as 'Cbus MySuper.'

### **Use of the Fund Validation Service to determine product name**

Use of the Fund Validation Service (FVS) is mandatory for APRA-regulated funds and provides superannuation providers and employers with a list of all of the provider's products. We note that the ATO no longer maintains 'trading name' data for entities, and also note the comment that the ATO do maintain 'product name' data from the FVS.

However, the FVS User Guide<sup>3</sup> states that the Unique Superannuation Identifier (USI) used to identify a fund's products and associated fund are required to match the data maintained in the SPIN register.

This does not resolve the issue of fund name recognition in all instances (eg, Cbus is shown as Construction & Building Unions Superannuation Fund). While this is more likely to be recognised than the legal entity name ('United Super Pty. Ltd'), it does not fully resolve the issue.

There are many instances where super funds are known almost exclusively by their acronym, and should be identified on this basis. Furthermore, it is commonplace in Australian financial services for an existing acronym to be redefined as a non-acronymous name, severing its link to its previous meaning. For example, AMP, while originally an acronym for the Australian Mutual Provident Society, no longer officially stands for anything and is an "orphan initialism". This trend should be recognised and addressed in relation to superannuation funds.

AIST recommend that the FVS be amended by the addition of another (voluntary) field showing the trading name of each product (e.g., Cbus MySuper). Where this field is populated, it should be drawn upon as the primary source of data for product name in the ATO online super account name display.

---

<sup>2</sup> <http://www.pc.gov.au/inquiries/current/superannuation/alternative-default-models/draft/superannuation-alternative-default-models-supplement.pdf>

<sup>3</sup> [https://www.ato.gov.au/uploadedFiles/Content/SPR/downloads/spr\\_35422\\_fund\\_validation\\_service\\_user\\_guide.pdf](https://www.ato.gov.au/uploadedFiles/Content/SPR/downloads/spr_35422_fund_validation_service_user_guide.pdf)

### **Display of fund logo**

The display of a super fund's logo alongside their product names on ATO Online will significantly aid fund and product name recognition. While recognising that it will probably not be possible to address this change in the current program of work, AIST nonetheless calls on the ATO to agree to the development of logo capability in the longer-term.

### **Other issues to be resolved**

The ATO Online services site display of fund names will presumably be used in an online choice of fund form.

In our submission on the ATO online choice form, we also submitted that the form should not be implemented via any portal (including ATO Online) until it:

- Lists the default fund for the employee, including the details in the current Choice form;
- Provides an up-to-date listing of employees' existing super funds (including SMSFs), together with near real-time information about balances, insurance, recent contributions, and MySuper status;
- Contains at least the same level of consumer protection information as the current Choice form;
- Undertakes further consumer testing.

AIST maintains this position, and changing the fund name displayed would not in any alter the above position requiring these issues to be addressed in the first instance.

*For further information regarding our feedback, please contact David Haynes, Executive Manager Policy & Research on 03 8677 3800 or at [dhaynes@aist.asn.au](mailto:dhaynes@aist.asn.au).*