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# SUPERANNUATION: A MORE COLLABORATIVE APPROACH NEEDED TO OVERCOME INDIGENOUS DISADVANTAGE

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The introduction of compulsory superannuation in 1992 by the federal government was intended to ensure that all Australians have the opportunity to achieve a higher standard of living in retirement than would be possible from the age pension alone.<sup>1</sup> The Commonwealth, pursuant to its corporations and pensions powers,<sup>2</sup> developed a framework of legislative enactments which together make provision for the regulation of the superannuation industry in Australia.<sup>3</sup> This includes measures intended to provide prudential regulation<sup>4</sup> and consumer protection.<sup>5</sup> The regulatory agencies responsible for overseeing compliance with superannuation legislation include the Australian Prudential Regulation Authority, the Australian Taxation Office and the Australian Securities and Investments Commission (ASIC). Addressing access and engagement issues for Indigenous consumers in the superannuation space has been a significant focus for ASIC's Indigenous Outreach Program (IOP).<sup>6</sup> ASIC's IOP is national a team of lawyers and analysts whose function it is to assist Aboriginal and Torres Strait Islander consumers to have fair and equitable access to financial products and services.

This article will explore the unique nature and some of the key challenges of the access and engagement issues experienced by Indigenous Australians when dealing with their regulated superannuation,<sup>7</sup> and will outline the current work being conducted by the industry to address some of these challenges. At the outset it's important to note that much of the evidence about Indigenous superannuation challenges remains anecdotal. A recent survey facilitated by superannuation industry associations was completed by 27 funds and found that just two of the participating funds had mechanisms to collect data on their Indigenous customers.<sup>8</sup> It's also important to note the diversity within Aboriginal and Torres Strait Islander populations is as great as the diversity in the broader Australian population, and not all Aboriginal or Torres Strait Islander people experience difficulties accessing and engaging with their superannuation. In fact, some are leading industry professionals. Nevertheless, the structural barriers faced by many Indigenous consumers when interacting with their superannuation fund are real, and have a

significant impact both on Indigenous superannuation members themselves and on the ability of the superannuation system to meet its proffered key objective—that is, to provide income in retirement to substitute or supplement the aged pension.<sup>9</sup>

## LITERACY, NUMERACY AND FINANCIAL EXCLUSION

Indigenous members of super funds are statistically more likely than non-Indigenous members to face socio-economic difficulties. Indigenous Australians experience higher rates of disadvantage against all measures of socio-economic status, including education, employment, income, housing and health.<sup>10</sup> People who face socio-economic difficulties usually also achieve poorer educational outcomes during primary and secondary schooling than their peers, and attain lower levels of English literacy and numeracy. The gap between people who meet national benchmarks in English literacy and numeracy and those who do not widens as students make the transition from primary to secondary school, and there is much evidence that the gap remains into adulthood unless an intervention is undertaken.<sup>11</sup> While many Indigenous students are meeting and exceeding national benchmarks in literacy and numeracy, the percentage of Indigenous students who are not is far greater than the percentage of students in the population as a whole.<sup>12</sup> In general, lower levels of literacy are present among Indigenous adults, particularly those from regional and remote communities where children have only participated in formal education in relatively recent generations.<sup>13</sup>

Lower levels of literacy and numeracy disproportionately impact on the financial exclusion levels of Aboriginal and Torres Strait Islander people, who are continuously overrepresented in this category.<sup>14</sup> The 2012 *Measuring Financial Exclusion in Australia* report by the Centre for Social Impact on behalf of the National Australia Bank found that 43.1 per cent of self-identifying Indigenous respondents were either severely or fully excluded from financial services compared to the national average of 17.2 per cent.<sup>15</sup> The ANZ Survey of Adult Financial Literacy in Australia is considered to be the most comprehensive report on financial

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literacy levels in Australia and includes data regarding Indigenous people. The last two ANZ Surveys have found that Aboriginal and Torres Strait Islander people, overall, had some of the lowest financial literacy scores in Australia.<sup>16</sup>

The lower levels of literacy and numeracy, and in turn financial literacy, as well as the greater percentage of Indigenous Australians who are either partly or fully financially excluded contributes to the lack of ability of many Indigenous consumers to properly understand their superannuation. Financially excluded people have little experience with financial products or services—even basic products and services, which means that understanding relatively complex superannuation products becomes almost impossible without adequately tailored information and educational services, very few of which exist.

### LANGUAGE BARRIERS

A small but not insignificant proportion of the Aboriginal and Torres Strait Islander population have limited English-speaking ability and are able to speak 'functional' English at best.<sup>17</sup> In the 2011 census, 11 per cent of Aboriginal and Torres Strait Islander peoples are reported as communicating predominantly in an Indigenous language at home.<sup>18</sup> Even for many people who speak English as their predominant or only language, communicating with superannuation funds can be challenging. Most Indigenous consumers identify face-to-face communication as being their preferred method of receiving complex information. Indigenous consumers say that face-to-face communication allows people to explain things to them properly, show them what they are talking about, and that people usually provide more honest information when they are speaking face-to-face.<sup>19</sup> Very few superannuation funds provide the option of face-to-face communication. The offices of the majority of superannuation funds are not accessible to the public, and even those that are tend to be located in the central business districts of the main Eastern capital cities. Most superannuation funds prefer members to contact them over the phone or in writing.

When a member contacts their superannuation fund over the phone, they are usually greeted by an automated voice message which asks them to select one of a number of options. The language used in these automated messages can be complex, technical and difficult to understand for anyone who has limited experience with financial products. The automated voice will often ask a member to press a number to hear information about their contributions, to hear more about their insurance and investment options, to hear a summary of the funds' diversification strategies recent performance . . . or to 'Press 7 to speak to a customer service assistant'. For those who manage to navigate

their way through to a customer service representative, they are then asked to provide sufficient personal information to identify themselves to the fund—which can cause significant challenges as outlined below.

Very few funds have a dedicated contact point for Indigenous members, and general telephone operators do not always understand the challenges faced by their Indigenous members. Of funds who participated in a 2013 industry survey, just four indicated that they had developed specific initiatives targeted at their Indigenous members, with just one fund producing tailored communication materials and guidance. The Indigenous working group concluded that awareness of issues specific to Indigenous members is limited and widespread attention has not been dedicated to improving service provision to Indigenous members.<sup>20</sup> The generally lower levels of understanding of superannuation among many Indigenous members, combined with the lack of awareness from fund representatives about the communication preferences and challenges faced by Indigenous members, makes effective communication difficult.

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During a recent trip to Cape York, ASIC's IOP witnessed some of these communication difficulties firsthand. An Indigenous community member who was relatively proficient in spoken English had received superannuation statements from a number of different funds. She had sought assistance to put all of the money into her main fund, where her current employer contributions were being paid. She managed to reach a customer service representative and clear the identification hurdles. She then had a conversation that went like this:

Consumer: 'Yeah, I just wanna put my accounts together.'

Fund: 'Can you give me some more information?'

Consumer: 'Yeah, I've got my money in three different accounts and I want to put them together.'

Fund: 'So you want to consolidate your superannuation?'

Consumer: 'Nah, I've got a few different accounts and I want to put them all into one.'

Fund: 'Yes, that's what I'm saying, can you just confirm that you would like me to consolidate your superannuation into [our fund]?'

Consumer: 'I don't know what this woman's on about, can someone help me out?'

If assistance was not available, the Indigenous member would probably ordinarily have become frustrated by not being able to understand and would have terminated the call.

In the IOP's regular consultations with Indigenous people across urban, regional and remote locations, the complexity and amount of information received from superannuation funds is consistently raised as a problem. Further, the lack of access to reliable information and service providers for those members living in remote locations is a significant barrier preventing Indigenous members from engaging with their funds.<sup>21</sup>

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### IDENTIFICATION ISSUES

The legislative instruments governing what identification details need to be collected and verified by superannuation funds are the *Anti-Money Laundering and Counter Terrorism Financing Act 2006* (Cth) (*AML/CTF Act*) and the *Superannuation Industry (Supervision) Act 1993* (Cth) (*SIS Act*).

Under the *AML/CTF Act*, a reporting entity must collect a minimum threshold of information before providing a designated service to the customer—such as establishing a superannuation account. The information that must be collected is a customer's name, date of birth and address.<sup>22</sup> The verification of customer details should be based on 'reliable and independent' documentation and/or electronic data. The types of documentation or data are not prescribed by the legislation, though examples are given.<sup>23</sup> In order to provide a subsequent service, such as providing information about a superannuation account over the telephone, reporting entities are required to verify the customer's full name, and *either* their address or their date of birth.<sup>24</sup>

Collectively, the identification requirements under the *AML/CTF Act* are called the 'Know Your Customer' test, which is a defined term under the *AML/CTF Rules*.<sup>25</sup> The rules encourage the trustees of individual funds to develop alternative verification procedures for certain categories of members and beneficiaries. This is suitable, provided that the procedures meet the trustees' overarching obligation to 'know their customer'. Where a fund assesses that its relationship with an individual customer is of *medium or lower*

money laundering or terrorist financing risk, then the fund may *choose* to apply a 'safe harbour' procedure, the details of which are set out in the *AML/CTF Rules*.<sup>26</sup> This procedure provides an even greater degree of flexibility for a fund in determining what they will require from a member to verify their identity. Even with this high degree of flexibility, most funds have risk averse policies that require a level of identity verification that is arguably far higher than that required by the legislation. Some funds do have alternative identification procedures for consumers who are unable to produce the standard identification documents; however, customer-facing representatives may not always assist consumers to be aware of these.

It is widely known that Indigenous consumers can struggle to provide adequately verified identity documentation to financial services organisations. Many Indigenous consumers do not have a birth certificate—for some this can be resolved by applying for a new certificate because they have lost their original copy, but for others, their birth has never been registered which makes the process much more difficult.<sup>27</sup> Some Indigenous consumers have multiple names. They may have a traditional name, a birth name and an adoptive name, and have different formal identification documents in each of those names. Where someone has applied for a photo identification document without their birth certificate, there may also be inconsistencies between the date of birth recorded for them on each of their identity documents.

In remote communities, identification documents such as driver's licences are often issued by the local police station. Inaccurate recording of the spelling of an individual's name or date of birth is not uncommon. On a recent trip to a remote community with a superannuation fund, ASIC's IOP was working with the superannuation fund to help one of its members verify their identity. The member, whose birth certificate recorded his first name as 'Normie', also had a driver's license that he had obtained from the local police station, but the name on his driver's license was recorded as Norman. Normie told us, 'Yeah, that name on my license, it's the wrong name.' We asked Normie whether he told the police that it wasn't his name. Normie said that he'd told them but they didn't listen and he didn't think it was too important so he just let it go. The date of birth on Normie's driver's license was also slightly different to that on his birth certificate. Normie's birth certificate, like many others that we have come across in remote communities, recorded his date of birth as 1 January. Normie knew his actual date of birth, which was not in January, and this is the date of birth that he told the police to put on his driver's license.

Even where an Indigenous consumer has a set of identity documents where all details are the same, having these documents

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certified in a remote community can present an insurmountable hurdle. Finding a photocopier that can produce an accurate representation of the document is often difficult, and finding a justice of peace or solicitor that is able to verify the documents can be a challenge.

## ISSUES IN REGARDS TO CONDITIONS OF RELEASE

In order for Australians to maximise the full benefit of their superannuation, strict legislative provisions exist about when a person can gain access to their preserved super. These are called 'conditions of release'. In addition to the legislative requirements, the trust deed of each super fund may contain further restrictions.

Super can be accessed regardless of retirement status after the age of 65 years; however the most common way super is accessed is upon reaching the 'preservation age', when the member is either retired or is transitioning to retirement. The 'preservation age' ranges from 55 to 60 years, depending on the individual's date of birth.<sup>28</sup> For people born after 30 June 1964, the preservation age is currently 60. Unfortunately, the current life expectancy at birth for Aboriginal and Torres Strait Islander people is on average 10 years less than non-Indigenous Australians, and in 2010–12 was found to be 69.1 years for men and 73.7 years for women.<sup>29</sup> This means that Indigenous members will often have less opportunity to enjoy the benefits of their superannuation than other Australians. It also means that the onset of chronic illness tends to occur earlier on average than for other Australians, sometimes leading Indigenous members to retire well before their preservation age.

A range of public interest advocacy groups,<sup>30</sup> most notably the Public Interest Advocacy Centre ('PIAC'), have highlighted that there is scope for the law to recognise the lower life expectancy of Indigenous members by reducing the preservation age applicable to Indigenous members.<sup>31</sup> PIAC has pointed to another area of public policy—the age at which people can access the Age Pension—as an area where the law has recognised a discrepancy between the life expectancies of different groups of people and made allowances accordingly.<sup>32</sup> PIAC highlights that the variation in life expectancy between men and women is around half of the variation between Indigenous Australians and the broader population, and yet the lower life expectancy of men is acknowledged in the pension entitlement age, with men being able to access the pension five years earlier than women.<sup>33</sup> While it is a valid argument that the discrepancy in life expectancies should be recognised in some way in the administration of the superannuation system, a reduction in the preservation age for Indigenous members may in itself lead to poorer outcomes. This is because the design of the superannuation system, where the total balance of the funds is invested, logically means that (taking

into account differing investment returns) the greatest growth of a member's superannuation balance usually occurs in the years directly preceding the member reaching their preservation age. Were the preservation age to be lowered for Indigenous members, this would result in Indigenous members not receiving the benefit of the largest growth phase of a superannuation account. Arguably, a better way of recognising the lower life expectancy of Indigenous members would be broadening the scope of early access provisions to ensure that it is easier for those members who are in poor health to obtain the benefit of their superannuation funds at that time.

Generally, individuals will find it very difficult to access their superannuation savings prior to reaching the 'preservation age', although alternative access arrangements for early access do exist in special circumstances, such as compassionate grounds, terminal medical condition, temporary or permanent incapacity and severe financial hardship.<sup>34</sup> These processes have strict requirements and are extremely complex and time consuming. Take, for example, severe financial hardship. In order to satisfy this condition, a member must be able to satisfy one of the two following scenarios:

1. they have received Commonwealth income support for 26 weeks and cannot meet reasonable and immediate family expenses; or
2. they have reached the 'preservation age' plus 39 weeks and have received Commonwealth income support payments for 39 weeks (cumulative) after reaching preservation age.<sup>35</sup>

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If a member meets one of these scenarios, they will also need to provide the trustee with written evidence provided by Centrelink or another Commonwealth department responsible for the income support payments, and they must be in receipt of the income support when the written evidence is prepared. The most common way Centrelink provides this written evidence is by way of a 'Q230 Form'. In order for it to be effective, it must not be dated more than 21 days before the date of application for severe financial hardship.<sup>36</sup> It has been the policy of Centrelink that this form will only be posted, resulting in this form frequently expiring by the time it reaches members in remote locations or at least by the time it reaches the fund. Although recent changes have been made allowing superannuation funds to check a member's eligibility using a Centrelink online portal, this effectiveness of this service is yet to be determined.<sup>37</sup>

For a member making a claim in the first scenario, which is where they have not reached the preservation age, there are restrictions on the amount that can be withdrawn,<sup>38</sup> and tax is payable on the lump sum withdrawal.<sup>39</sup> For those with already relatively low levels of super and high levels of debt, this option is unlikely to ease severe financial hardship.

## CURRENT INDUSTRY RESPONSE TO IMPROVE ACCESS AND ENGAGEMENT FOR ABORIGINAL AND TORRES STRAIT ISLANDER PEOPLE

Since employer-paid superannuation became compulsory in 1992, numerous reports and discussion forums have identified the structural barriers faced by Indigenous consumers engaging with the superannuation system, particularly those in remote and regional areas.<sup>40</sup> Despite the significant concerns evidenced in these reports and forums, few superannuation funds have taken active steps to address these issues until recently. Initial work by ASIC's IOP in 2012–13 to raise these issues with the superannuation industry and government led to the establishment of the Indigenous Superannuation Working Group. The group is comprised of a number of superannuation peak bodies and funds and has quickly taken the lead on developing industry-led solutions to these issues and striving to put them on the national agenda. Following on from a discussion paper released in February 2015, the Indigenous Superannuation Working Group held the inaugural Indigenous superannuation summit which was attended by more than 90 stakeholders, including representatives from the superannuation and banking industries, Indigenous and government agencies and consumer groups. Attendees committed to a number of actions that will improve access and engagement for Indigenous people which were outlined in a report on the summit.<sup>41</sup> Key priorities and commitments include:

- investigating ways that superannuation funds themselves can introduce greater flexibility into their identification requirements for Indigenous members who may not have access to standard forms of ID;
- greater engagement and collaboration with Indigenous communities on super-related issues;
- increased data collection by funds regarding members who identify as Aboriginal and/or Torres Strait Islander; and
- improved cooperation across the represented stakeholder groups including government departments and the Australian Bankers' Association.

In August, the Indigenous Superannuation Working Group presented the report to government and pushed for Indigenous superannuation issues to be included on the Council of Australian Governments' (COAG's) agenda. The Indigenous Superannuation

Working Group emphasised the need for government to 'cut red tape' and encouraged COAG to take a more collaborative approach in order to significantly improve retirement outcomes for Indigenous people.<sup>42</sup>

Many of the challenges faced by Indigenous people are challenges that could be faced by any other person in Australia. As a multicultural nation that is continuing to grow with newly arrived Australians, issues such as lack of identification and misspelt names will be widespread. The changes that need to be made by funds are small but could make a big difference, including taking a person-centred approach to the issue and looking for a solution on a case-by-case basis. In many instances, the fund will not know whether the caller is Indigenous and, depending on the issue, this may not be relevant to the solution. On face value, the legislation appears to be more flexible than the policies of some funds would suggest. It is positive to see the renewed focus from the superannuation industry on these challenges, along with public statements of commitment made by many funds to be involved in a process that seeks to come up with innovative ways of assisting Aboriginal and Torres Strait Islander people to better understand their superannuation and reduce the barriers to access that currently exist for some. It is important that the industry, with any required support from the government, now makes tangible changes in line with the commitments that they have made in their discussion paper and seeks to implement these changes as soon as practicable in order to meet their fiduciary obligations of ensuring equitable access for all Australians.

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- 1 Department of Communications, Information Technology and the Arts, 'A More Flexible and Adaptable Retirement Income System' (Commonwealth of Australia, 2004), 1.
- 2 The Commonwealth's constitutional power to make laws with respect to corporations and pensions is prescribed by *Constitution* ss 51(xx), 51(xxiii) respectively.
- 3 The main legislative enactments are: the *Superannuation Industry (Supervision) Act 1993* (Cth); the *Retirement Savings Accounts Act 1997* (Cth); the *Superannuation (Resolution of Complaints) Act 1993* (Cth); the *Superannuation Guarantee (Administration) Act 1992* (Cth); the *Small Superannuation Accounts Act 1995* (Cth); the *Superannuation (Unclaimed Money and Lost Members) Act 1999* (Cth); and the regulations that accompany these Acts.

- 4 See the *Superannuation Industry (Supervision) Act 1993* (Cth), the *Retirement Savings Accounts Act 1997* (Cth), the *Corporations Act 2001* (Cth) and accompanying regulations.
- 5 See the *Superannuation (Resolution of Complaints) Act 1993* (Cth) establishing the Superannuation Complaints Tribunal for the resolution of prescribed complaints and the *Superannuation (Unclaimed Money and Lost Members) Act 1999* (Cth) in relation to the handling of unclaimed superannuation.
- 6 For more information about ASIC's Indigenous Outreach Program, see <<https://www.moneysmart.gov.au/life-events-and-you/indigenous/indigenous-outreach-program>>.
- 7 This article only deals with the challenges faced by Indigenous consumers when dealing with regulated superannuation funds; that is, funds (other than self-managed superannuation funds), approved deposit funds and pooled superannuation trusts. Regulated superannuation funds are regulated under the *Superannuation Industry (Supervision) Act 1993* (Cth).
- 8 Indigenous Superannuation Working Group, 'Building better superannuation outcomes for Aboriginal and Torres Strait Islander people' (Discussion paper, February 2015) <<https://www.aist.asn.au/media/14204/Indigenous%20Working%20Group%20-%20Discussion%20Paper.pdf>>.
- 9 Australian Government, 'Financial System Inquiry Final Report' (Report, 7 December 2014), 95 <<http://fsi.gov.au/publications/final-report/>>.
- 10 Sarah Bassiuni and Alexis Goodstone, 'Securing Better Outcomes For Aboriginal And Torres Strait Islander People In Superannuation', Public Interest Advocacy Centre, 2013, 2.
- 11 Nola Purdie et al, 'Literacy and Numeracy Learning: Lessons from the Longitudinal Literacy and Numeracy Study for Indigenous Students', Australian Council for Educational Research, 2011, 6–28, 68.
- 12 Ibid.
- 13 Inge Kral and Jerry Schwab, 'The Realities of Indigenous Adult Literacy Acquisition and Practice: Implications for Capacity Development in Remote Communities', Centre for Aboriginal Economic Policy Research—The Australian National University, 2003.
- 14 Financial exclusion has been defined as a 'lack of access to affordable and appropriate financial services and products from mainstream institutions, measured on the basis of ownership of 3 basic financial products': Les Hems et al, 'Measuring Financial Exclusion In Australia', Centre for Social Impact—University of New South Wales, 2011, 4.
- 15 Ibid 8.
- 16 ANZ, 'ANZ Survey of Adult Financial Literacy in Australia', 2011; ANZ, 'ANZ Survey of Adult Financial Literacy in Australia', 2014.
- 17 Seventeen per cent of Indigenous people who reported speaking an Indigenous language at home in the 2011 Census reported that they didn't speak English well, or at all: 2076.0—*Census of Population and Housing: Characteristics of Aboriginal and Torres Strait Islander Australians*, 2011 <<http://www.abs.gov.au/ausstats/abs@.nsf/Lookup/2076.0main+features902011>>.
- 18 Ibid.
- 19 Australian Government Department of Finance, 'Media Consumption and Communication Preferences of Aboriginal and Torres Strait Islander Audiences: Qualitative Research' (2014), 4–45.
- 20 Indigenous Superannuation Working Group, above n 8, 6.
- 21 See for example, ASIC, 'Book up in Indigenous communities in Australia: A national overview' (ASIC Rep 415, October 2015) <<http://download.asic.gov.au/media/3374112/rep451-published-13-october-2015.pdf>>. The unique nature of the challenges faced by Indigenous people in accessing their superannuation has also been recognised by the Australian Taxation Office and was a contributing factor that led to the development of their Reconciliation Action Plan: <<https://www.ato.gov.au/general/aboriginal-and-torres-strait-islander-people/the-support-we-provide/reconciliation-action-plan/>>.
- 22 *Anti-Money Laundering and Counter-Terrorism Financing Rules Instrument 2007 (No 1)* r 4.2.3, as amended under s 229 of the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth).
- 23 Ibid r 1.2.
- 24 Ibid r 4.2.6.
- 25 Ibid r 4.2.3.
- 26 Ibid.
- 27 Paula Gerber and Melissa Castan, 'Achieving universal birth registration for Indigenous Australians: Recommendations from the Victorian Law Reform Commission' (2014) 8(14) *Indigenous Law Bulletin* 11–14.
- 28 *SIS Act* s 62(1)(a) and *Superannuation Industry (Supervision) Regulations 1994* reg 6.01.
- 29 Steering Committee for the Review of Government Service Provision, 'Overcoming Indigenous Disadvantage: Key Indicators 2014', 28 <<http://www.pc.gov.au/research/recurring/overcoming-indigenous-disadvantage/>>.
- 30 Above n 10, 1.
- 31 Ibid 2–3.
- 32 Ibid.
- 33 Ibid.
- 34 *Superannuation Industry (Supervision) Regulations 1994* reg 6.19A; *Retirement Savings Accounts Regulations 1997* reg 4.22A.
- 35 *Superannuation Industry (Supervision) Regulations 1994* reg 6.01(5) and (5A).
- 36 *Superannuation Industry (Supervision) Regulations 1994* reg 6.01(5A).
- 37 <<http://www.humanservices.gov.au/customer/services/centrelink/early-release-of-superannuation>>.
- 38 *Superannuation Industry (Supervision) Regulations 1994* Sch 1 stipulates that a member can access up to \$10 000 of their super benefit in each 12 month period, and a minimum of not less than a single lump sum of \$1000.
- 39 The lump sum will be taxed at 22 per cent (including Medicare Levy and Temporary Budget Repair Levy) or your marginal tax rate, whichever is lower <[https://www.ato.gov.au/individuals/super/in-detail/withdrawing-and-paying-tax/withdrawing-your-super-and-paying-tax/?page=3#How\\_tax\\_applies\\_to\\_your\\_super](https://www.ato.gov.au/individuals/super/in-detail/withdrawing-and-paying-tax/withdrawing-your-super-and-paying-tax/?page=3#How_tax_applies_to_your_super)>.
- 40 See for example: National Aboriginal and Torres Strait Islander Women's Alliance, 'Aboriginal & Torres Strait Islander women and superannuation' (2013); Brad Pragnell, 'Superannuation policy issues for Indigenous Australians: scope for reform' (2002) 45 *The Australian Universities' Review*; Sarah Bassiuni and Alexis Goodstone, 'Securing better outcomes for Aboriginal and Torres Strait Islander people in superannuation', The Public Interest Advocacy Centre, 2013; and Ross Clare, 'Equity And Superannuation—The Real Issues', The Association of Superannuation Funds of Australia Limited, 2012.
- 41 Indigenous Superannuation Working Group, 'Indigenous Super Summit Report—July 2015' (Report, July 2015) <[http://www.aist.asn.au/media/653940/2015\\_indigenoussupersummit\\_report\\_v2final.pdf?>](http://www.aist.asn.au/media/653940/2015_indigenoussupersummit_report_v2final.pdf?>).
- 42 Indigenous Superannuation Working Group, 'Government needs to cut red tape to improve Indigenous super outcomes' (Media Release, 13 August 2015) <[https://www.aist.asn.au/media/15030/2015\\_08\\_13\\_media\\_Indigenous\\_Super.pdf](https://www.aist.asn.au/media/15030/2015_08_13_media_Indigenous_Super.pdf)>.