From: s 22(1)(a)
To: s 22(1)(a)
Cc: s 47E(d) s 22(1)(a)(ii) [Leahy, Megan](); [Hope, Angela](); s 47E(d) s 22(1)(a)(ii) s 22(1)(a)(ii)
Subject: AS REQUESTED: OFW brief on WwWA's Policy Brief - Superannuation for Under 18s: A Gendered Lens [SEC=OFFICIAL]
Date: Thursday, 23 July 2026 10:57:00 AM
Attachments: image001.png
image002.png
image004.png
image003.png
image005.png
image006.png
image007.png
image008.png
MO request - Superannuation for Under 18s Brief.docx

OFFICIAL

Hi s 22(1)( )(ii)

As requested, please find attached a short brief on the analysis in WwWA's Superannuation for Under 18s policy brief. OFW's brief covers:

- The current state of the under 18s superannuation exemption, and WwWA's proposal to remove it
- Treasury and OFW analysis of WwWA and Super Members Council's figures and claims in the WwWA policy brief
- Rationale for why the under 18s superannuation exemption remains
- Background on the previous Greens proposed partial disallowance to the *Treasury Laws Amendment (Payday Superannuation) Bill 2025*.

s 47C

We note Treasury does not have existing modelling available to accurately test the claims in the WwWA policy brief. s 47C
s 47C

Hope this helps and happy to chat.

Best,

s 22(1)(a)(ii)
Director
Employment and Social Services | Women's Economic Policy Branch
Department of the Prime Minister and Cabinet
s 22(1)(a)(ii)
One National Circuit, Barton ACT 2600 | PO Box 6500 CANBERRA ACT 2600
e s 22(1)(a)(ii)@pmc.gov.au w. pmc.gov.au

decorative

From: s 47E(d) @pmc.gov.au>
Sent: Tuesday, 14 July 2026 2:04 PM
To: s 47E(d) @pmc.gov.au>
Cc: s 47E(d) s 22(1)(a)(ii) @finance.gov.au>; s 22(1)(a)(ii) @finance.gov.au
Subject: FW: Superannuation for Under 18s: A Gendered Lens (Policy Brief) [SEC=OFFICIAL]

OFFICIAL

Hi OFW,

Please see correspondence sent by WwWA regarding superannuation. The MO would be grateful if you can please work with Treasury on modelling, especially whether super for this cohort would be taken by fees. Amy would appreciate a break down explaining this s 47C s 47C s 22(1) cc'ed for vis.

Grateful if OFW can please provide a short briefing note in reply to this email by the end of next week (July 24) or otherwise advise on a more reasonable timeframe.

Thanks,
s 22(1)
s 22(1)(a)(ii) | **Departmental Liaison Officer**
Office of Senator the Hon Katy Gallagher
Minister for Finance, Minister for Women, Minister for the Public Service and Minister for Government Services
Ministerial and Parliamentary Support | Department of the Prime Minister and Cabinet
P: s 22(1)(a)(ii)
E: s 47E(d) @pmc.gov.au

The Department of the Prime Minister and Cabinet (PM&C) would like to acknowledge the Traditional Custodians of Country throughout Australia and their continuing spiritual, social and cultural relationship with the land, waters, skies and community. We pay our respects to their Elders past and present, and to their community leaders, and extend that respect to all Aboriginal and Torres Strait Islander peoples.

From: Equality Policy <equality.policy@WwWA.org.au>
Sent: Tuesday, 14 July 2026 11:40 AM
To: Gallagher, Katy (Senator) <Senator.Katy.Gallagher@aph.gov.au>
Subject: Superannuation for Under 18s: A Gendered Lens (Policy Brief)

Dear Minister,

I am writing on behalf of the Working with Women Alliance to share our recent policy brief, *Superannuation for Under 18s: A Gendered Lens*. Attached is a letter that outlines a policy recommendation relevant to your commitment to improving economic equality for women.

The Working with Women Alliance, convened by the Commonwealth Office for Women, provides evidence-based advice to Government on gender equality and gender-based violence. This policy brief was co-authored by our Young Women's Working Group to determine the most pressing policy issues for young women in Australia.

We welcome the opportunity to meet with you to discuss the brief and policy recommendations, and to support your advocacy in this space.

Yours sincerely,

Dr Gemma Killen (she/they)

Executive Director – Working with Women Alliance

Direct: 0477 232 134 | Central: 02 6185 2000

Level 2, 71 Northbourne Avenue Canberra, ACT 2601

Ngunnawal Country

www.wwwa.org.au

Superannuation for Under 18s Brief

Current state of superannuation for under 18s and Working with Women Alliance (WwWA) proposal

- Currently, employers are only required to pay workers under 18 Superannuation Guarantee contributions if they work more than 30 hours per week.
- In their Policy Brief *Superannuation for Under 18s: A Gendered Lens*, WwWA recommends **abolishing this 30-hour per week superannuation exemption for workers under 18** (WwWA proposal). They argue that the age-based exemption contributes to the gender superannuation gap and reduces retirement savings for women and men.

Key points:

- Treasury is currently unable to provide modelling of the WwWA proposal's impact on retirement balances or the retirement income gap but has provided general analysis below.
- s 47C [redacted]

Analysis of WwWA and Super Members Council claims

s 47C [redacted]

WwWA statement:

"The Super Members Council estimate that paying super to all workers under-18 could mean that a typical teenage woman who works for at least two years… [could have an additional] ***$11,000*** *when they reach retirement age. Similarly… a typical teenage man could have…* ***$9,000*** *more by retirement. [On average,* ***women retire with less than $61,000 compared to men****]. This means that the aged-based exclusion could contribute to approximately* ***one fifth (18%) of the superannuation gap*** *at retirement"*

- s 47C [redacted]

- Treasury cannot verify the Super Members Council (SMC) estimates referenced in the Brief.
- s 47C [redacted]

s 47C [redacted]

WwWA statement:
"The aged-based exemption was put in place to ensure fees and insurance would not erode small super balances and therefore undermine efforts to put aside super for young working Australians. [However] since 2002, further amendments have been implemented to protect small superannuation balances"

- Since 2019, superannuation funds have been prevented from charging certain fees and costs in excess of 3 per cent of the balance for accounts below $6,000.
- s 47C [redacted]

Reasons for retaining the 30-hour superannuation exemption for under 18s

s 47C

- [redacted]
- [redacted]
- [redacted]

Background

***Greens proposed partial disallowance**: Treasury Laws Amendment (Payday Superannuation) Bill 2025*

- On 30 June 2026, the Australian Greens moved a partial disallowance of regulations associated with the *Treasury Laws Amendment (Payday Superannuation) Bill 2025* **to allow all workers under 18 to be paid superannuation**.
- In introducing the disallowance, Australian Greens Senator Barbara Pocock argued that the current arrangements unfairly exclude a large proportion of young workers from the superannuation system, with **women** being disproportionately affected. Key arguments put forward in support of the disallowance:
    - Approximately **93 per cent of workers under 18 work fewer than 30 hours per week**, largely due to school and study commitments, and therefore do not qualify for compulsory superannuation contributions.
    - The current arrangements constitute age-based discrimination, as workers under 18 are subject to eligibility requirements that do not apply to adult workers.
    - Because **young women** are more likely to **work part-time** than young men, the exemption has a disproportionate impact on **women**.
    - The exemption is estimated to exclude around **515,000 young workers** from compulsory superannuation coverage, resulting in approximately **$405 million in missed superannuation contributions in 2025-26.**
- **Outcome:** On 1 July 2026, **Labor and the Coalition** voted against this partial disallowance. During debate, Labor senators did not provide reasons for opposing the proposal.
- Coalition senators outlined reasons for maintaining the current arrangements, including that:
    - The existing exemption strikes an appropriate balance between supporting young workers and **limiting additional costs for employers**.
    - Businesses are already preparing for the i**mplementation of payday superannuation reforms**, which will **increase compliance obligations**.
    - Removing the exemption could increase the cost of employing young workers and may have **unintended consequences for youth employment opportunities, particularly given that youth unemployment remains above the national average.**

Working with Women Alliance

Senator The Hon Katy Gallagher
Minister for Women
Minister for Government Services
Minister for Finance
Minister for the Public Service
Senator for the ACT
PO Box 6100
Senate
Parliament House
Canberra ACT 2600

Via Email: senator.katy.gallagher@aph.gov.au

14.07.2026

Superannuation for Under 18s: A Gendered Lens (Policy Brief)

Dear Minister

I am writing on behalf of the Working with Women Alliance (WwWA) to highlight the gendered implications of superannuation exclusions for under 18s that work less than 30 hours per week for a single employer.

Given your work to improve the lives of women and girls throughout your career, and your commitment to improving economic equality for women, WwWA would like to share our policy brief on Superannuation for Under 18s: A Gendered Lens.

The brief finds that:

- Young women are more likely to work than young men.
- Young women under 18 have an average superannuation balance of just over half that of their male peers.
- The age-based exemption accounts for approximately one-fifth of the superannuation gap at retirement.
- A third of under 18-year-olds are already paid superannuation, indicating appetite for businesses to implement potential legislative changes.

WwWA recommends that the 30-hour per week superannuation eligibility threshold for under 18s be abolished.

Working with Women Alliance

We would welcome the opportunity to discuss this recommendation further with your office. Thank you for continued leadership on women's economic security and gender equality.

Yours sincerely,

s 22(1)(a)(ii)

Dr Gemma Killen
Executive Director – Working with Women Alliance
Gemma.killen@wwwa.org.au
https://wwwa.org.au/
M: 0477 232 134
Level 2, 71 Northbourne Avenue Canberra, ACT 2601

Superannuation for Under 18s: A Gendered Lens

Policy Brief

July 2026

Contact:

Dr Gemma Killen
Executive Director - Working with Women Alliance
Equality.policy@wwwa.org.au

Acknowledgment of Country

The Working with Women Alliance acknowledges the Traditional Custodians of the land on which we work and live.

We pay our respects to Aboriginal and Torres Strait Islander Elders past and present, and we value the enduring connection Aboriginal and Torres Strait Islander people have to this land.

We value Aboriginal and Torres Strait Islander histories, cultures, and knowledge.

About Us

The Working with Women Alliance (WwWA) represents two key portfolios: Gender-based violence and Gender Equality.

The WwWA connects the critical areas of gender-based violence prevention and the advancement of women's economic equality and leadership, bridging these important policy fields for greater impact.

We work with members and stakeholders, including the Australian Government, to provide expertise and advice on gender equality and women's safety.

Executive Summary

Workers under the age of 18 only receive superannuation if they work more than 30 hours per week for a single employer. This age-based exemption widens the gender superannuation gap through three demographic characteristics:

- Women under 18 are more likely to work than men under 18
- Women are more likely than men to work part time
- Men are more likely than women to work in apprenticeships/traineeships, where full-time work is more prevalent.

As a result, young women under 18 have an average superannuation balance of just over half (58%) that of young men under 18.

The Super Members Council estimate that women are retiring with $11,000 less in super due to this age-based exemption, leading to higher rates of economic insecurity later in life. On average, women retire with less than $61,000 compared to men. This means that the age-based exemption accounts for approximately one-fifth of the superannuation gap at retirement.

WwWA recommends that the 30-hour per week superannuation eligibility threshold for under 18s be abolished.

Context

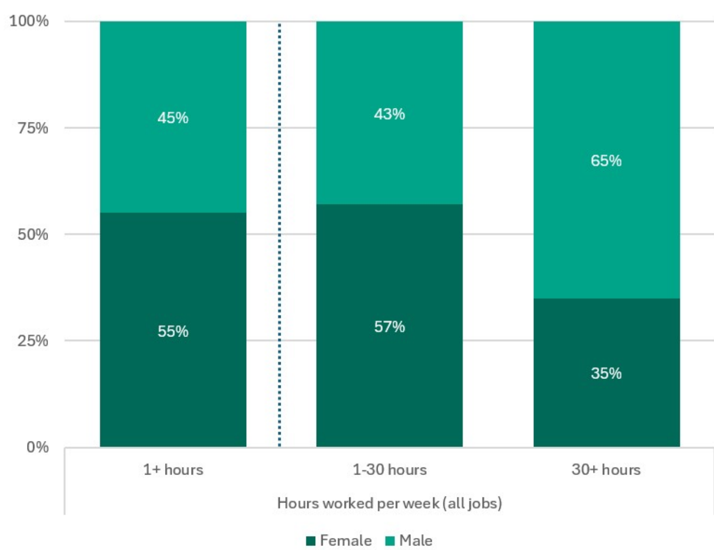
Employers are legally obligated to pay their workers superannuation under the *Superannuation Guarantee (Administration) Act 1992* (Cth) (SGAA). All workers are entitled to a 12% employer contribution to their superannuation accounts – with some exceptions; workers under the age of 18 only receive superannuation if they work more than 30 hours per week for a single employer.[1]

When superannuation was established, the super guarantee rate started at 3 per cent of people's wages. The aged-based exception was put in place to ensure fees and insurance would not erode small super balances and therefore undermine efforts to put aside super for young working Australians. Since 2002, further amendments have been implemented to protect small superannuation balances.[2] The exclusion undermines one of the founding principles that Superannuation was established on – universality; that all Australian workers build retirement savings.[3]

Despite the exemption, the Super Members Council estimates that around 30% of young people under the age of 18 were paid super, despite not working 30 hours per week, which demonstrates the available appetite and infrastructure for change.[4]

Super for under-18s is a gendered issue

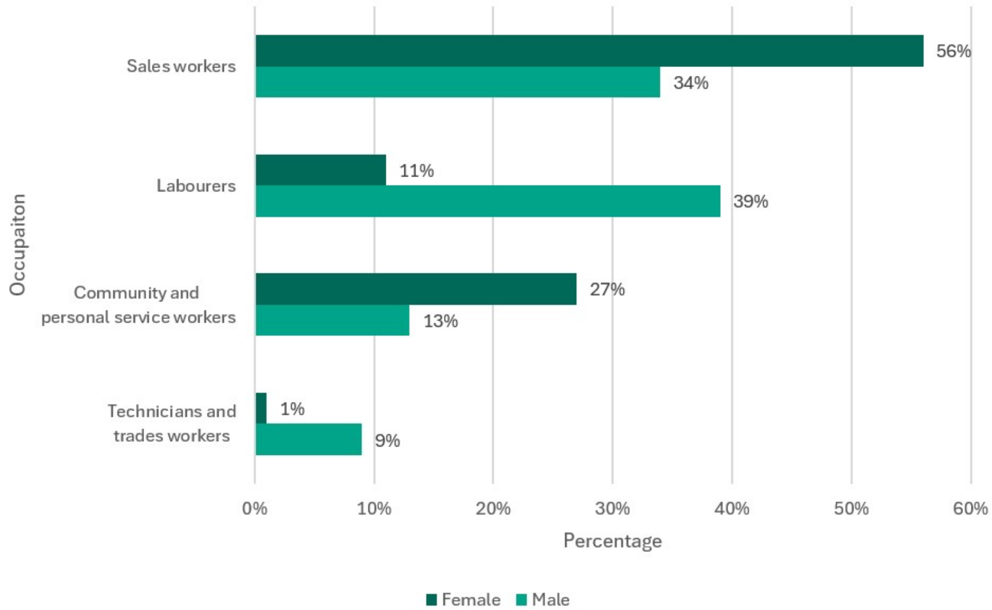
The majority of under-18s (93%) work less than 30 hours a week across all jobs they are employed in and therefore are not entitled to superannuation. Figure 1. demonstrates that young women under 18 make up a greater proportion of people who work more than one hour per week (55%) compared to young men under 18 (45%), however, a higher proportion of young men under 18 work more than 30 hours (65%) compared to young women under 18 (35%).[5]



Source: Super Members Council

Figure 1. Distribution of under-18 male and female workers by hours worked

Young men under-18 are more likely to work in jobs where full-time roles and apprenticeships are more prevalent and are therefore eligible to be paid superannuation. Figure 2 highlights that these include occupations such as labourers, technicians and trades workers. Women are more likely to work in occupations with higher rates of casualisation, such as sales workers, community and personal service workers and clerical and administrative workers.[6]

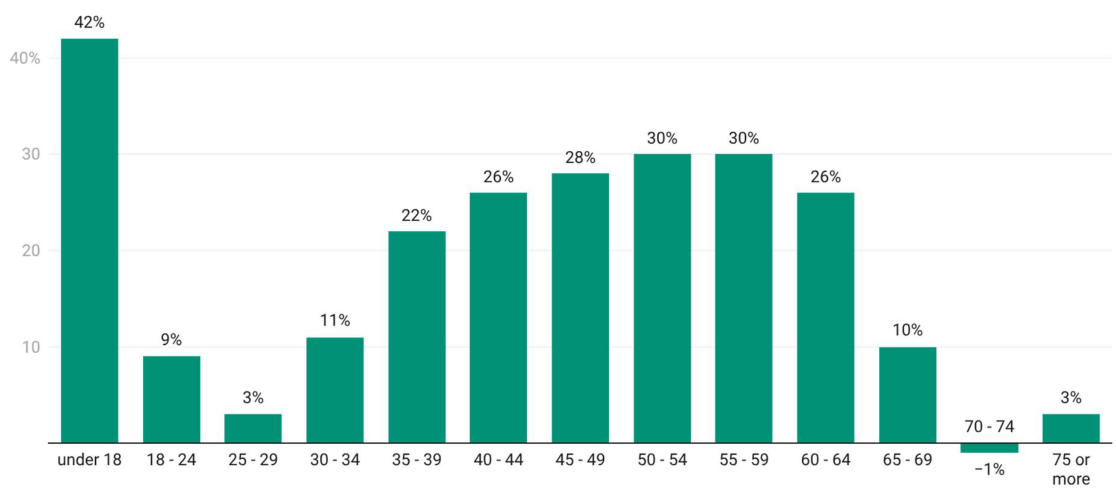


Source: Super Members Council

Figure 2. Percentage of under 18s in occupations by sex

The Gender Super Gap

The factors described above result in a superannuation gap of 42% for under 18s, which decreases to 9% for 18-24s (Figure 3).[7]

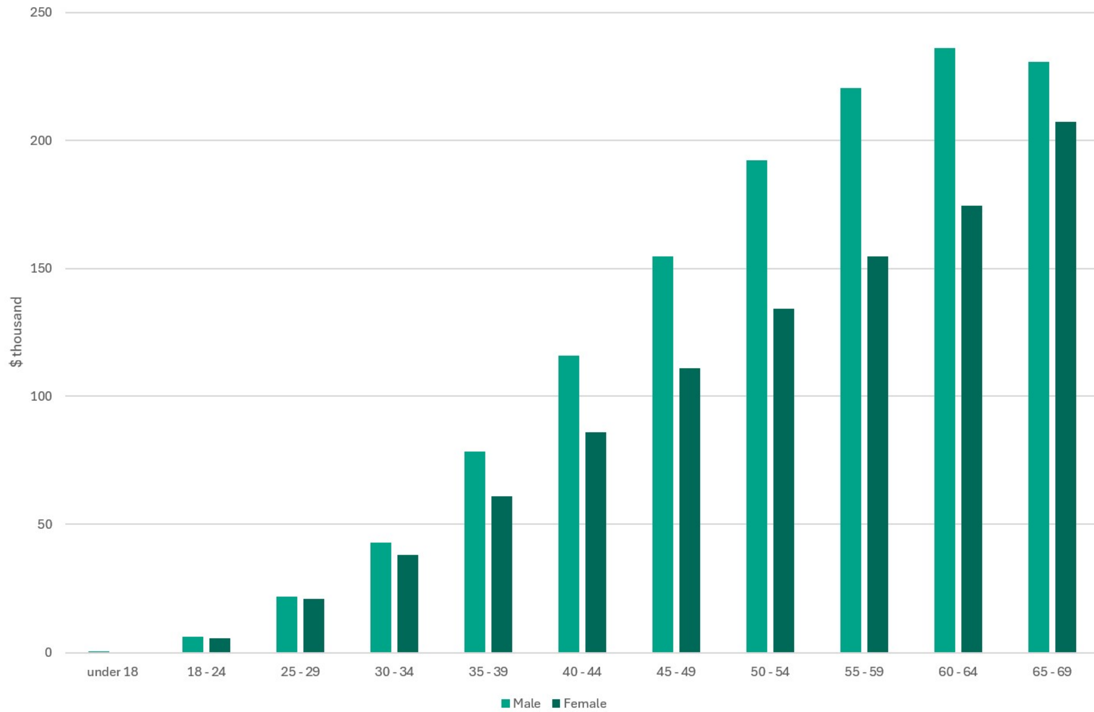


Source: Australian Taxation Office

Figure 3. Super annuation gap based on median super balance, by age and sex, 2023-24

Aged-based exclusions for under-18s impacts financial security later in life

On average, women have around $61,000 less in superannuation than their male peers in pre-retirement (60-64), a super gap of 26% (Figure 4).[8]



Source: Australian Taxation Office

Figure 4. Median super balance, by age and sex, 2023–24

The super gap contributes to economic and financial insecurity for older women. They are more likely to:

- retire earlier due to inflexible work arrangements, their health (for example, the need to manage menopause symptoms) or need to care for a sick partner, family member with a disability, elderly parents or grandchildren.
- be financially impacted by divorce or separation or lose homeownership and face heightened risk of falling into poverty if they do not re-partner.
- be impacted by family and domestic violence.[9]

The benefits of removing the aged-based exclusion for superannuation payments

The Super Members Council estimate that paying super to all workers under-18 could mean that a typical teenage woman who works for at least two years benefit from almost $2,500 in their superannuation by the time they turn 18. They project that this could grow to $11,000 when they reach retirement age. Similarly, they estimate that a typical teenage man could have $2,000 more super by age 18, and $9,000 more by retirement.[10]

This means that the aged-based exclusion could contribute to approximately **one fifth** (18%) of the superannuation gap at retirement due to compounding interest.

Recommendation

1. Abolish the 30-hour per week superannuation eligibility threshold for under 18s.

References

[1] Fair Work Ombudsman. (2026). Tax and superannuation. https://www.fairwork.gov.au/pay-and-wages/tax-and-superannuation
[2] Super Members Council. (2024). *Guaranteeing a Super Start to Work: Paying Super Guarantee to all workers under 18 years of age.* https://smcaustralia.com/wp-content/uploads/2024/11/SMC-report-Guaranteeing-a-super-start-to-work.pdf#page=4
[3] Super Members Council. (2026). Parts of the superannuation system. Super Members Council. https://smcaustralia.com/parts-of-the-superannuation-system/
[4] Super Members Council. (2025). *Closing the gender super gap: Pay super to all under-18 workers.* https://smcaustralia.com/wp-content/uploads/2025/12/251105-SMC-REPORT-U18-GENDER-LENS.pdf#page=4
[5] Ibid.
[6] Ibid.
[7] Australian Taxation Office. (2026). Individuals statistics for Taxation statistics 2023–24. https://www.ato.gov.au/about-ato/research-and-statistics/in-detail/taxation-statistics/taxation-statistics-2023-24/statistics-in-taxation-statistics-2023-24/individuals-statistics-for-taxation-statistics-2023-24#Chart12Individuals
[8] Ibid.
[9] Super Members Council. (2025). *Economic security in retirement How life events affect older Australian women*. https://smcaustralia.com/wp-content/uploads/2025/09/Older-womens-economic-security-in-retirement-compressed.pdf#page=9
[10] Super Members Council (2025) *Closing the gender super gap: Pay super to all under-18 workers*.

From: s 22(1)(a)
To: s 22(1)(a)(ii)
Cc: s 47E(d) s 47E(d) Hope, Angela; s 22(1)(a)(ii)
Subject: RE: Minister for Women"s Office Request - Treasury Input on Superannuation Exclusions for Under-18 Workers [SEC=OFFICIAL]
Date: Tuesday, 21 July 2026 4:49:49 PM
Attachments: image006.png
image007.png
image001.png
260721 Under 18s PMC Request Points.docx

OFFICIAL

Hi s 22(1)(a)(ii)

Please find our response attached.

We've largely borrowed from analysis that we've done in the past, given timeframes. Happy to chat through any of the responses.

Kind regards,
s 22(1)(a)(ii)

s 22(1)(a)(ii) Assistant Director
Retirement Income Frameworks Unit
Retirement Income and Tax Administration Branch
Individuals and Indirect Tax and Superannuation Division
P s 22(1)(a)(ii)

treasury.gov.au
Langton Crescent, Parkes ACT 2600
Twitter | LinkedIn | Facebook

The Treasury acknowledges the traditional owners of country throughout Australia, and their continuing connection to land, water and community. We pay our respects to them and their cultures and to elders both past and present.

OFFICIAL

From: s 22(1)(a)(ii)@pmc.gov.au>
Sent: Thursday, 16 July 2026 12:03 PM
To: s 22(1)(a)(ii)@TREASURY.GOV.AU>
Cc: s 47E(d)@pmc.gov.au>; Hope, Angela <Angela.Hope@pmc.gov.au>; s 22(1)(a)(ii)@pmc.gov.au>;

s 22(1)(a)(ii) @pmc.gov.au>
Subject: Minister for Women's Office Request - Treasury Input on Superannuation Exclusions for Under-18 Workers [SEC=OFFICIAL]

> You don't often get email from s 22(1)(a)(ii) @pmc.gov.au. Learn why this is important

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Hi s 22(1)(a)(ii)

Thank you for the call earlier this morning!

As discussed, the Minister for Women's Office has received a letter from the Working with Women Alliance (WwWA) regarding the **gendered implications of the superannuation exemption for employees under 18 years of age who work fewer than 30 hours per week** for a single employer. The WwWA shared its recent policy brief which recommends removing this exemption: *Superannuation for Under 18s: A Gendered Lens*.

The Minister's Office has asked us to engage with Treasury to gather information to support their/the Minister's engagement on this topic with the WwWA. To support briefing, we would appreciate Treasury's advice on the following:

1. **Treasury's views on the policy brief, including the data and modelling**
    - In particular, on the Super Members Council estimates regarding the projected increases in superannuation balances for women and men at retirement, and reduction in the gender superannuation gap, if the 30-hour exemption were removed.
2. **Treasury's own data and modelling**
    - Any available modelling Treasury has that compares the current under-30-hours exemption with a no-exemption scenario (particularly any gender breakdowns).
    - The Minister's Office is particularly interested in the extent to which **fees** may affect superannuation balances if there was no exemption.
3. **Rationale for retaining the under-30-hours exemption**
    - Including any cost-benefit analysis or other considerations that have informed Treasury's/the Government's position.
4. **Broader economic considerations**
    - Any wider economic impacts associated with removing the exemption, such as potential effects on youth employment or workforce participation.

We would be grateful if Treasury could provide its input by **COB Tuesday, 21 July**, to enable us to brief the Minister's Office as soon as possible.

Apologies for the short timeframe, and very happy to discuss further.

Many thanks,

s 22(1)(a)(ii)

s 22(1)(a)(ii)
Adviser | Employment and Social Services
Women's Economic Policy Branch | Office for Women
Department of the Prime Minister and Cabinet
e. s 22(1)(a)(ii) h@pmc.gov.au p. s 22(1)(a)(ii) w. pmc.gov.au

1. **Treasury's views on the policy brief, including the data and modelling**

    - **In particular, on the Super Members Council estimates regarding the projected increases in superannuation balances for women and men at retirement, and reduction in the gender superannuation gap, if the 30-hour exemption were removed.**

- Treasury cannot verify SMC's estimates of projected increases in superannuation balances at retirement in these timeframes. s 47C [redacted]

s 47C

[redacted]

2. **Treasury's own data and modelling**

    - **Any available modelling Treasury has that compares the current under-30-hours exemption with a no-exemption scenario (particularly any gender breakdowns).**

- Treasury is unable to provide up to date modelling on the proposed policy's impact on superannuation balances at retirement under the current timeframes.

- **The Minister's Office is particularly interested in the extent to which fees may affect superannuation balances if there was no exemption.**

s 47C

- [redacted]
- Previous reforms to superannuation have also reduced the potential for low balance accounts to be eroded through fees. Since 2019, superannuation funds have been presented from charging certain fees and costs in excess of 3 per cent of the balance for accounts below $6,000.

3. **Rationale for retaining the under-30-hours exemption**

    - **Including any cost-benefit analysis or other considerations that have informed Treasury's/the Government's position.**

s 47C

- [redacted]
- [redacted]
- [redacted]
- The Senate Standing Committee on economics, in its report on the Treasury.Laws. Amendment.(Payday.Superannuation).Regulations.868❷, noted it supports in principle paying superannuation to workers under 18 from the first hour worked. However, doing so would require careful consultation and further analysis of potential impacts.

4. **Broader economic considerations**

    - **Any wider economic impacts associated with removing the exemption, such as potential effects on youth employment or workforce participation.**

s 47C

- [redacted]