

1. Who are you:

Individual/Business

2. Are you making a submission in relation to the proposals for a:

Specified Person (SP)

3. Please tick the sectors that apply to you:

Professional services

4. After reading about the proposed new eWHT system, how would you describe your overall reaction?

Somewhat positive - I think it's a good idea overall

5. What aspects of the proposed model appeal most to you, and why?

As I understand it, the application of withholding tax would become more tailored to the contractor involved.

6. What concerns or reservations do you have about the proposed approach?

The existing system is very difficult for us. We are basically a not-for-profit organisation, and each year we are charged 20% withholding tax throughout the year on a substantial part of our total income. We have to wait until the following year, after we have submitted our tax return, before we can get this tax re-imbursed. That makes cash flow very difficult, and I as a director need to provide a personal loan to the company every year in order to allow us to continue to operate.

7. The proposed eWHT model seeks to expand withholding tax to payments to service providers where a suitable withholder exists. How do you feel generally about this type of expansion?

I have no problem with that.

- 8. In relation to PSWT specifically, this currently applies to payments made by state and semi-state bodies for certain services. Do you have a view on how it is targeted and if the types of payments it applies to should be reviewed?**

See my answer to 9 above. PSWT should not be applied to companies which operate on a not-for-profit basis.

- 9. Please indicate if you currently operate:**

- 10. From the perspective of a DW, how does the current application of PSWT and/or RCT impact on your business operations?**

- 11. If you are a Platform Operator, does your organisation have any experience of applying taxes to transactions, for services operating on your platform, in other jurisdictions? If yes, please provide information of the jurisdiction and details of the tax.**

- 12. From the perspective of a DW, what are your views on the application of RCT and/or PSWT, as the case may be?**

- 13. What is your understanding of the withholding tax model of tax collection of RCT and PSWT and why it is applied to payments?**

- 14. The proposal aims to embed eWHT processes directly into accounting, payroll, or other business management systems. How beneficial do you think this would be for your business?**

- 15. In your view, what opportunities could embedding eWHT within natural business systems create for your business or the wider industry?**

- 16. What challenges do you think your business might face in adopting this embedded within natural systems approach?**
- 17. What is the estimated number of payments that you make to SPs each month?**
- 18. Do you currently use software for processing payments and or managing the finances of your business? If so, what packages do you use?**
- 19. Are you an employer for PAYE? If so, which software package do you use to report payroll taxes to Revenue?**
- 20. Please indicate if you currently receive payments which are subject to deduction of:**
- Professional Services Withholding Tax (PSWT)
- 21. Where you are currently subject to PSWT and/or RCT, how does the current application of withholding taxes impact on your business operations?**
- Badly. See my response to 9 above.
- 22. From the perspective of a SP, what are your views on the application of RCT and/or PSWT, as the case may be?**
- I approve of the overall principle, but it needs to be applied in a much more nuanced and realistic way.
- 23. What is your understanding of the withholding tax model of tax collection of RCT and PSWT and why it is applied to payments?**

24. Where you are an SP operating as a corporate/partnership or other entity, do the current rates that apply to PSWT and RCT reflect your actual liability on the income received?

Not at all. We are charged 20% PSWT and our actual liability is virtually zero.

25. The proposal aims to embed taxation directly into how you get paid by the DW. How beneficial do you think this would be for your business?

It would be fine, if a realistic rate of withholding tax were to be applied.

26. Where you are an SP operating as an individual worker, the proposal aims to implement personalised deduction rates (PDR), which means you will pay tax on your income as you go, similar to how employees are taxed under PAYE. What impact do you think PDR will have on your cashflow and financial management?

It wouldn't have any effect on me personally.

27. Do you think this new regime, including the PDR will have a positive effect on your end of year Income Tax return filing and preliminary tax payment obligations?

No.

28. The accuracy of PDR is improved by the regular reporting by you to Revenue of your income and business expenses. How likely are you to report your income and expenses to improve the accuracy of your PDR?

There would be no need. I already have tight control on my personal tax liabilities and I budget for that throughout the year.

29. What changes do you expect to have to implement in your business in order to be ready for the proposed eWHT regime?

That is unclear to me. Maybe we would need to submit projected year-end profit figures at different points of the year.

30. What benefits do you expect the new regime to have on your business processes, costs and delivery of your business services?

If it is tailored to our actual tax liability it would massively help with cash flow throughout the year.

31. What would you consider a reasonable timeframe for your business to adapt to the proposed new system?

That depends completely on what adaptation would be required.

32. How confident are you that your business could adapt to the new system within a reasonable timeframe?

Quite confident.

33. In terms of the management of your business, which outcomes from this new regime are the most important for you? (Select a maximum of 3)

Being taxed on the basis of our actual (minimal) tax liability rather than an arbitrary 20%..

34. What supports from Revenue would be of most benefit to you in transitioning to the new regime? (Select a maximum of 3)

Helpdesk or dedicated Revenue contact

Mailshots and guidance on the Revenue website

35. Is there anything else you'd like to share about how the proposed eWHT system could best meet the needs of your business or sector?

No.

