

**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:**

Education - online teaching of English as a foreign language

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

Very negative - I do not support the proposed direction

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

None

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

I would be concerned about job loss. The online platform I currently provide tutoring services on may not want to implement this system as it may be overcomplicated for them since they have thousands of workers worldwide they can choose from & it may make Irish tutors less appealing to have on the platform. They may seek native English speakers/tutors from other countries instead such as the U.S., Canada, Australia, New Zealand & the U.K. Also I currently get paid weekly so it may overcomplicate the tax process rather than just paying it at the end of the year. I will still have to fill in my form at the end of the year declaring revenue / taxes etc. so I see no real benefit - just that it will make things even more complicated. Even other platforms/websites in the same industry/other industries may make workers from certain countries ineligible to work on a given website as it may be so complicated to do so when they could have over 10,000 workers or more. Often workers are just a number on platform websites, not individuals that they know well like employees. I don't see why we should have to be subjected to this risk since we're not PAYE

workers & don't get the same benefits that they workers get. Online a person can be let go due to regional complications, unlike PAYE workers in Ireland.

**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?**

Overcomplicated - websites may not want to comply - too much work for them and thus they may exclude Ireland as a region they can have platform workers from.

**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?**

**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:**
- 21. Where you are currently subject to PSWT and/or RCT, how does the current application of withholding taxes impact on your business operations?**
- 22. From the perspective of a SP, what are your views on the application of RCT and/or PSWT, as the case may be?**

**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?**

**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?**

Not beneficial may be let go as it's more work for them so why would they bother. People can be seen as just numbers online.

**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 would just make it more confusing. Right now it's easy for me to calculate everything at the end of the tax year and pay what's owed. It's also easier from a cashflow perspective to budget everything effectively.

**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. It will probably just make it more complicated, that's if I'm still working on said platform as it may be more hassle for them to implement and they may just accept workers from other countries instead who don't have these complications.

**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?**

I will do what I have to legally. Any of these things just make me feel like everything is going to get unnecessarily overcomplicated with no benefit to the online worker - there will just be more time consuming tasks to do.

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

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

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

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

**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 able to continue working on the platform & not being excluded because I live and work in an EU country.

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

None, not sure platforms will want to comply online

**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?**

I think the online world works very differently to the PAYE world of workers in Ireland and this should be considered. I don't see the logic of applying the same criteria to a space that works completely differently to offline work in Ireland. Over complication of this may lead to job losses and less opportunities online for Irish workers. Instead of the online world being another source of revenue it may instead reduce that

revenue coming into Ireland due to overcomplicated regulations and ineligibility of workers from the island.

