

Short Guide to the Code of Practice for Revenue Compliance Interventions

In order to uphold the integrity of the tax code, Revenue operates a framework of compliance interventions to provide a consistent and graduated response to taxpayer behaviour. We provide extensive opportunities for taxpayers to get things right and to voluntarily correct mistakes. We conduct risk-focussed and proportionate interventions in response to identified risks of possible non-compliance.

There are 3 levels of Compliance Intervention. The following paragraphs briefly explain each Level and what you should do if you are notified of an intervention. Any notification of an intervention will clearly state whether the Intervention is at Level 1, 2 or 3.

Level 1 Compliance Interventions

Level 1 Compliance Interventions are designed to assist taxpayers in being voluntarily compliant. Under a Level 1 Intervention, taxpayers can address any compliance matters through **Self-Correction** or by making an **Unprompted Qualifying Disclosure** as appropriate.

Level 2 Compliance Interventions

Level 2 Compliance Interventions may be conducted as either a **Risk Review** (generally a review of a single tax issue) or a more in-depth **Audit** of your tax affairs. A Level 2 Notification will set out the taxes and periods under examination. Following notification of a Level 2 Intervention, you cannot avail of Self-Correction or make an **Unprompted Qualifying Disclosure**. However, you can still address compliance issues, mitigate penalties, if applicable, and avoid publication as a defaulter by making a **Prompted Qualifying Disclosure** within 28 days of the notification, and by cooperating fully throughout the intervention. If you wish to make a prompted qualifying disclosure and require more than the 28 days' notice provided by the notification letter, you can contact Revenue within 21 days of the notice to seek an additional 60 days in which to submit a prompted qualifying disclosure.

A **Risk Review** is deemed to commence 28 days after the date of the notification letter. An **Audit** commences once we begin examining your books and records. In the case of an Audit, a taxpayer may make a prompted qualifying disclosure on the day of the audit but prior to our examination of books and records.

Level 3 Compliance Interventions

Revenue Investigation is the Level 3 Compliance Intervention and usually commences with effect from the date of the notification. There is no opportunity to make a Qualifying Disclosure but penalties may still be partially mitigated where you cooperate fully with the investigation.

What you should do when you receive notification of a Revenue Compliance Intervention?

You should carefully note the level and scope of the intervention, review your records and consider whether you should now submit either a Self-Correction or a Qualifying Disclosure.

Code of Practice

For full details of the Compliance Intervention Framework, including detailed explanations of each type of intervention, opportunities for self-correction or disclosure, procedures relating to the published quarterly List of Tax Defaulters and your rights as a taxpayer during a Revenue intervention, please read the Code of Practice for Revenue Compliance Interventions, which is available on our website at <https://www.revenue.ie/en/tax-professionals/documents/code-of-practice-revenue-compliance-interventions.pdf>

The information in this document is provided as a guide only and is not professional advice, including legal advice. It should not be assumed that the guidance is comprehensive or that it provides a definitive answer in every case.