

Relevant Contract Tax Site Identifier Number

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Version 1.2

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1. Introduction

With effect from December 2015, there was a change to the fields required during Contract Notification. Previously there had been one 'Location' text box field where a Principal would type the location of the Relevant Contract. This development added fields for a Site or Project Name and Address.

Associated with these new fields was a Site Identifier Number (SIN). When a Principal contractor submits a new Contract Notification via ROS, they receive a system generated Site Identifier Number for that site or project. This number is used on all contracts submitted by the Principal in relation to this site or project. When the Principal or their subcontractors use this SIN number on their subsequent contracts for this site or project, the Site or Project Name and Address fields is automatically populated for them.

When the contract is a maintenance or repair contract, and the subcontractor is working at many different locations on behalf of the Principal contractor, the Principal should describe the Site or Project Name as 'Maintenance contract for.......', in which case they can then input their head office address (i.e. the Principal can enter their own HQ address) as the address for this contract (as opposed to the administrative burden of entering many multiple addresses for each of the locations where the relevant contract works are being carried out).

Where the relevant contract is not a maintenance or repair contract and the subcontractor is working at a number of locations, there is a facility for the Principal to input up to 10 site addresses per contract.

Principals are able to view all SINs on ROS.

In line with legislation, Principals are required to input their Contract Notifications as soon as possible after entering into a relevant contract with their subcontractors. Timely updating is crucial so that that subcontractor (who may also be a principal contractor) will immediately have access to the SIN, if they in turn engage subcontractors. If a Principal is in breach of this legislative requirement they may be liable for a penalty.

2. Contract Notification

When making a Contract Notification, a Principal should create a SIN for a site or project which does not have one. They do this by entering the Site or Project Name and Address. For a site or project which already has a SIN a Principal can either enter the SIN or select the SIN from a list of contracts on ROS.

2.1. Create the SIN

If required, a Principal can choose the New Site button. This clears all previously entered site information and the Principal is then be able to hide current sites (or show current sites if necessary). This option creates a new SIN and the contractor must enter the Site or Project Name and Address.

After clicking New Site as a validation the Principal is asked 'Are you the Main Principal Contractor on this Site?'. To proceed they must select 'Yes' or 'The Main Principal entered the contract prior to December 2015'. If the Principal selects 'No' a warning message is displayed, and the principal cannot proceed. The warning message is as follows: -

'The Principal Contractor on this site should provide you with a Site Identifier Number. Please contact the Principal Contractor to acquire this before proceeding. Please do not attempt to create an additional Site Identifier Number for an existing site.'

The Principal is then asked, 'Is your work confined to a single location with an address or a wide area of operation?'

Upon selecting single location, the Principal is invited to enter the Site or Project Name and address.

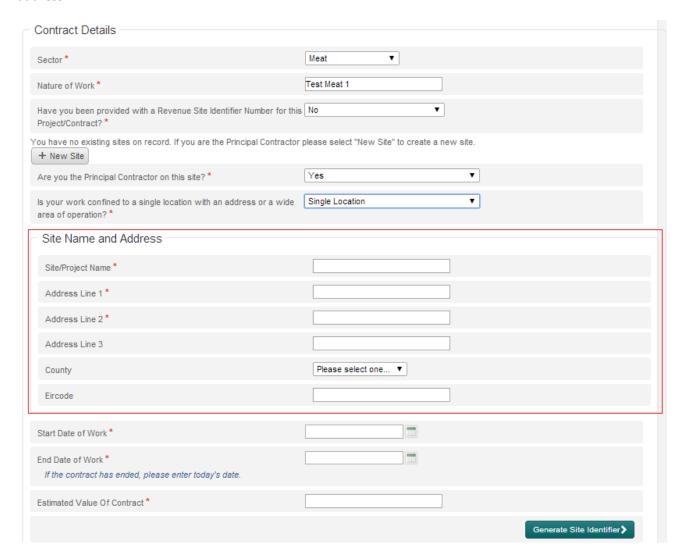


Figure 1. Contract Notification, SIN created by entering Site or Project Name and Address

If the Principal chooses the wide area of location, they then have the option of inputting multiple addresses to account for the multiple locations of the works for the relevant contract. This option caters for a maximum of 10 addresses. If there are more than 10 addresses involved in the works and the works cannot be considered a maintenance or repair contract, the Principal should only enter the most important locations for the works, with the most important address first.

How Principals can deal with maintenance or repair contracts is outlined in the Introduction above. In addition, there is an example provided below.

With these details entered the Principal is presented with the button to 'Generate Site Identifier'. When the SIN has been generated a warning is displayed relating to the use of the SIN in subsequent contracts: -

'Please note that the entry of the first contract for a new site must be completed on the Contract Notification Acknowledgement page before the site identifier can be used for the entry of additional contracts for the same site.'

i.e. Contract Notification must be fully completed prior to using the SIN in another contract.

This Site Identifier Number (SIN) should be used on all subsequent contracts for all contractors for the same site or project.

The Principal can then proceed with submitting the contract notification.

2.2. Enter the SIN

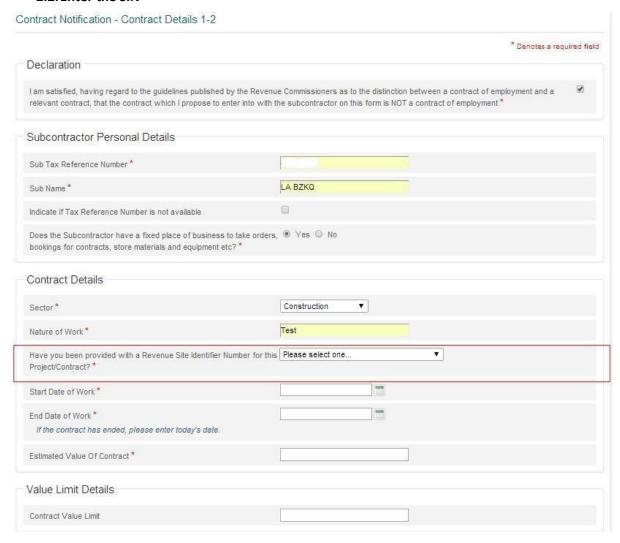


Figure 2. Contract Notification - Enter the SIN (Tax Reference Numbers have been removed)

When completing the Contract Notification, there is an additional question to complete - Have you been provided with a Revenue Site Identifier Number for this Project or Contract? If the Principal submits 'Yes' they are requested to enter the SIN. When a SIN is entered, the Principal should

click on 'Verify Revenue Site Identifier Number' button for the SIN to be validated. The Contract Notification is then automatically populated with the Site or Project Name and Address.

For Principals inputting multiple contracts at the same time in offline mode, the SIN entered is validated on upload and the verify option is not visible. When a valid SIN has been input the system displays details of both main Principal and the site address, the Principal can confirm that the details are correct.

If the Principal submits 'No', they can select the SIN from a list of contracts associated with them which have been previously entered into the eRCT system, or they can enter a new site. When the Principal enters a new site, a new SIN is generated and when the Contract Notification is complete both Principal and Subcontractor are notified of the SIN.

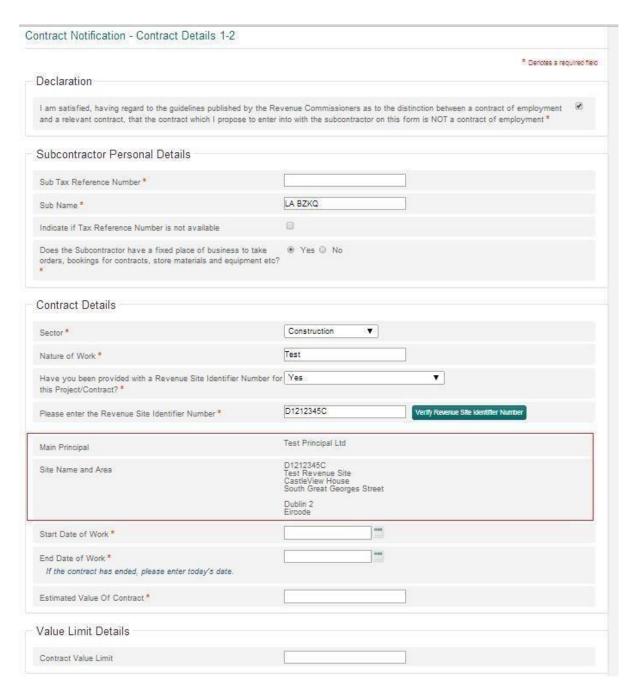


Figure 3. Contract Notification, SIN validated, and Project Name and Address automatically populated (Tax Reference Numbers have been removed)

If a SIN is entered in an invalid format an error message is displayed on the screen 'Revenue Site Identifier supplied is not in the valid format' and the Principal cannot proceed with entering the contract. If a SIN entered is formatted correctly but is not a registered SIN then the error message displayed will be 'SIN number not found.'

2.3. Select the SIN

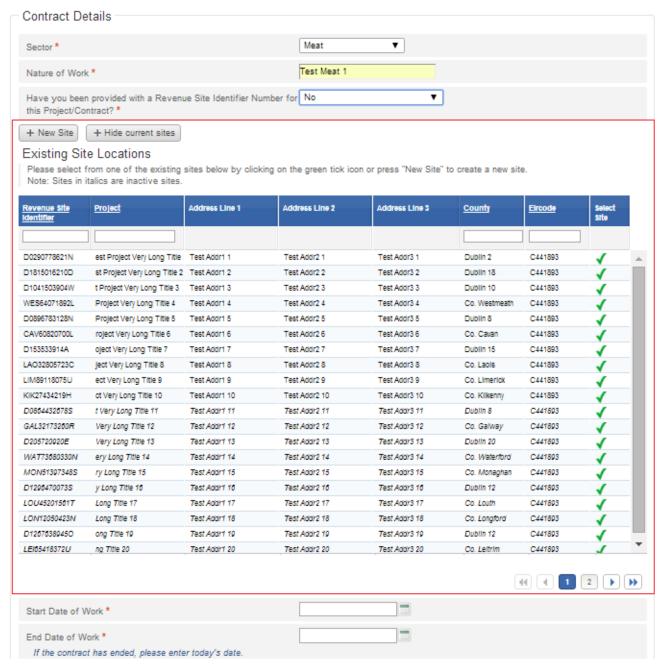


Figure 4. Contract Notification showing list of contracts, so a SIN can be selected, or Principal can select the New Site button

As noted above, if the Principal submits 'No' to the question 'Have you been provided with a Revenue Site Identifier Number for this Project or Contract?' they can select the SIN from a list of contracts associated with them which have been previously entered into the eRCT system, or they can enter a new site.

When 'No' is selected, a table of all sites which have been linked to the contractor is displayed. The Contractor can select one from the list by clicking on the green tick 'V' icon to the right of the sites displayed. Once selected, the site details are displayed on the screen including the main Principal Contractor on that site and the Site or Project Name & Address.

Sites are ordered so that the newest one is at the top of the list. To differentiate between active and inactive sites, inactive sites are displayed in italics. You can choose an inactive site and reactivate it should a contract be registered. For Contract Notification purposes, an 'inactive site' is a contract where the end date of that contract has expired.

If a Principal does not have any existing sites with a SIN the message 'You have no existing sites on record' is displayed.

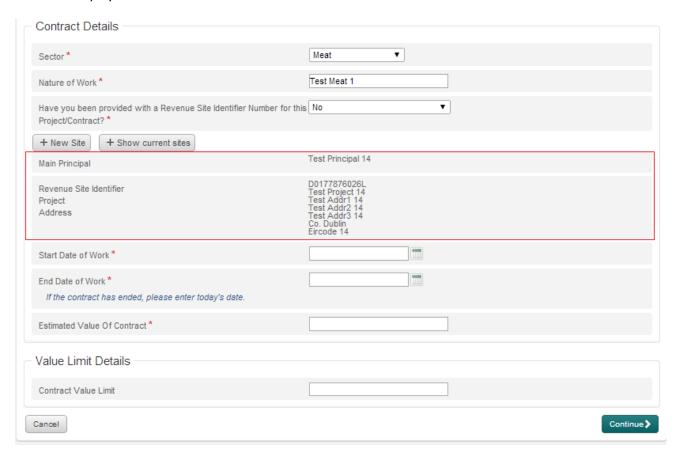


Figure 5. Contract Notification, SIN selected, and Project Name and Address automatically populated

3. Output

All Subcontractors are notified of the Site Identifier Number on their Contract Confirmation letter. In addition, if the Principal amends the contract details, the subcontractor is then notified, and the SIN number is displayed on the Contract Amendment letter.

In this way SINs for Sites and Projects are notified to all the contractors working on that Site or Project. This enables all contractors to use the existing SINs when they are making their Contract Notifications as appropriate.

4. Third Party Upload for RCT Contracts to be updated to include Revenue Site Identifier

For Principals who use third party software to upload Contract Notifications, the Revenue Site Identifier Number is added to the XML upload file for the RCT contract addition service. The service only allows uploads for contracts with a valid existing site identifier number.

Upon upload, new validation is triggered checking the SIN number provided and comparing it with those on record. If there is not a match a validation error is returned to the user.

The upload only allows one contract per upload if any of the uploaded contracts do not have a SIN. This is because a SIN must be provided on a case by case basis to prevent the creation of duplicate SINs for one Site or Project. Multiple contracts (up to 10) can be uploaded at a time if the SIN is provided with those contracts.

5. Existing Contract Notifications

All contracts input into the eRCT system prior to December 2015 do not have a SIN attached to them. These contracts do appear on the list of existing contracts (see figure 4) when a Principal is seeking to select a SIN for the current Contract Notification.

Principals who amended existing contracts after December 2015 were asked to provide the appropriate Site or Project Name and Address details for that contract if one had not already been created, and that contract was then provided with a SIN.

6. Site or Project Definition

In general, a new site and a subsequent new SIN should be created for each overall Project. Within this there are possibilities where multiple SINs would exist for the same contract locations – this would occur where those contracts are not related to the same Project, e.g.

Consider the following scenario where 4 different SINs would exist for the same location: -

A new school is to be built in Clondalkin in Dublin....

a) The building of a new school at an address from December 2019 to February 2023

All the contracts from all the Principals who work on the construction of this school should use the same SIN which was initially generated by the main Principal Contractor when they entered the first contract.

b) The maintenance or repair contract for the upkeep of the windows of the same school (and 25 other schools) from 2019 to 2023

This maintenance or repair contract forms part of a contract for the upkeep of windows in 25 other buildings. In this scenario, the Principal should create a new contract with a new SIN. The Site or Project Name for this contract should be 'Maintenance contract for upkeep of windows in 25 schools in Dublin Region.' and the address to be used for this Contract Notification should be the Principal's HQ address.

c) Ongoing specific maintenance or repair in this school only

All maintenance or repair contracts which occur in this school only could be grouped together in one SIN. This allows the Principal to automatically populate the Project Name and Address each Contract Notification at this location. In this scenario, the Project Name should be 'Maintenance contracts which occur at St Joseph's Comprehensive'; the address should be the address of the school.

d) The building of a gymnasium or sports hall at the same school, contract runs from July 2023 to July 2024.

This is a new Project which is occurring at the same location of a previous Project. It should have a new SIN, and all the contracts from all the Principals who work on the construction of this sports hall should use the same SIN. Again, the SIN is generated by the main Principal Contractor when they are entering the first contract for this Project. All subsequent subcontractors then have the SIN propagated to them by the eRCT system.

7. Conclusion

Since December 2015, there has been a mandatory field in the Contract Notification process in the eRCT system. The field is for a 'Revenue Site Identifier Number' (SIN). Each contract requires a SIN when the Contract Notification process is being completed. The SIN is a system-generated identifying number which is applied to the location or locations where relevant operations are due to take place under a particular contract.

From the above date, when a Principal contractor is updating the eRCT system with details of a new contract at a new location for the first time, the system automatically provides a Revenue Site Identifier Number when they enter the location of the relevant operation. This SIN is also provided to the Subcontractor on the Contract Notification that issues to them. When identifying the location of relevant operations, Principals must enter both the Site or Project Name and the address.

Once the system has generated the SIN, the Principal or Subcontractor should enter only the SIN instead of the location for any further updates they make to the eRCT system in respect of the same Site or Project.

To ensure notification of the SIN to all the contractors who require it in Contract Notification, it is crucial Principals input their Contract Notifications as soon as possible after entering into a relevant contract with their subcontractors. This is so that subcontractors who may also be Principal contractors can immediately have access to the Site Identifier Number, if they in turn are required to engage subcontractors on the same Project. If a Principal is in breach of this legislative requirement they may be liable for a penalty.

8. FAQs

The following list of FAQs have been complied to provide greater clarity and smoothing of potential administrative burdens from its incorrect use.

8.1. Why was the SIN introduced?

The purpose of the SIN is to ensure Revenue has the correct information with respect to the location of relevant contracts. This is done in two ways: -

- instead of asking for a Location of a contract, asking for a Project or Site Name and address
- using the SIN as a mechanism to allow Principals to pre-populate their Contract Notifications with the correct Project or Site Name and address

8.2. If my Principal never obtained a SIN, as a Principal or Subcontractor do I need to contact my Principal and ask them to obtain the SIN?

No. Existing contracts were not converted and provided a SIN by Revenue. Only existing contracts which Principals amend themselves were provided a SIN – this is done by asking the Principal to supply a Project or Site Name and address when they are amending the contract. As a result, when a subcontractor becomes a Principal or Subcontractor by engaging a subcontractor on a Project or Site they may not have a SIN they can use when they make their own Contract Notification. In such an instance the Principal or Subcontractor should create their own SIN for the Project or Site, and it should be used by them and their subcontractors subsequently.

This is done as a part of Contract Notification by initially stating you have not been provided a SIN, and then clicking the 'New Site' button. The next part is important in relation to this particular issue – the Principal or Subcontractor is asked 'Are you the Main Principal Contractor on the site?' There are three answers available, 'Yes', 'No', or 'The Main Principal entered the contract prior to December 2015' – the Principal or Subcontractor must specify the latter answer to this question. They can then go on to enter the Project or Site Name and address and generate their own SIN.

8.3. Haulage relevant contracts tend to have significant numbers of locations; can the guidance for maintenance contracts be used in such cases?

Yes. If the relevant contract which you wish to notify is a haulage contract to multiple locations. Principals can describe the Site or Project Name as 'Haulage contract acrossregion', in which case they can then input their head office address (i.e. the Principal can enter their own HQ address) as the address for this contract (as opposed to the administrative burden of entering many multiple addresses for each of the locations where the haulage contract is delivering to).

8.4. As a Principal I have waste disposal for multiple but small contracts covered by a skip which is located in my HQ. How do I manage Contract Notification and subsequent Payment Notification?

In such a case, one contract with the waste disposal subcontractor actually refers to many multiple minor sites across a wide area location. When the Principal is making a Contract Notification he can select 'wide area location' and enter up to 10 addresses for a contract. Given there may be significantly greater locations on such a contract, the Principal can approach such contract notification in a manner similar to the guidance provided to maintenance or repair contracts, i.e. in the Project Name put 'Waste Disposal for Contracts across the xxxx region', and in the Address put the HQ address of the Principal. Such an approach is seen as an appropriate way to deal with the administration burden of entering many addresses for a relevant contract, where such a contract does not have subsequent subcontractor engagements.

8.5. How does the SIN affect Payment Notification on rolling contracts?

The Payment Notification system is not affected by the introduction of the SIN. The SIN has introduced more precise data being entered to describe the location of a relevant contract. Previously this was an un-validated text field called 'Location' – this is now replaced with a Project or Site Name and Address. This has not affected the nature of rolling contracts – Contracts can still be amended to reflect new contract values and new end dates, and payments can continue to be made on these contracts.

Since the introduction of the eRCT system there have been two concessions with respect Contract Notification and Payment Notification. These concessions: -

- allow a Principal to enter payments on any of the contracts for the same Subcontractor no matter what specific contract that payment refers to (see <u>S.I. 412 in 2013</u> and <u>eBrief 47/13</u>)
- allow a Principal to extend the date and contract value of an existing contract with a subcontractor rather than enter a new contract for that same subcontractor, should he be engaged again. (see <u>Tax and Duty Manual 18-02-04</u>)

These concessions have not yet been withdrawn. Principals can still put all the payments to a subcontractor on one contract, but they must input all the contracts they have engaged in, into the eRCT system. Principals can also extend existing contracts for subcontractors they are already engaged with, rather than entering new contracts.

8.6. In self-build home situations there is no main Principal. How does the SIN operate?

In the case of self-build houses the contract with the home owner is not a relevant contract given that (typically) the home owner is not involved in construction as part of their profession.

In the case of the subcontractor of the home owner engaging their own subcontractors, each subcontractor would generate their own SIN typically describing their own Project name as 'Block laying to house on 31 James' Rd' and the address information would be as required. Similarly, it may be 'Plastering to house on 31 James' Road'.

Subcontractors engaged in separate trades on a self-build are unlikely to substantially subcontract out their work. If they do, those subcontractors need to specify their contract name and address. Essentially, each subcontractor as necessary would register the site and create a SIN. In this way, for self-builds it may be the case that the home owner hires multiple contractors who may end up creating multiple SINs for one project.

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.

The Revenue Commissioners collect taxes and duties and implement customs controls. Revenue requires customers to provide certain personal data for these purposes and certain other statutory functions as assigned by the Oireachtas. Your personal data may be exchanged with other Government Departments and agencies in certain circumstances where this is provided for by law. Full details of Revenue's data protection policy setting out how we will use your personal data as well as information regarding your rights as a data subject are available on our Privacy page on Revenue.ie. Details of this policy are also available in hard copy upon request.