

1. Who are you:

Individual/Business

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

Designated Withholder (DW)

3. Please tick the sectors that apply to you:

Professional services

Medical 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?

Real time

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

Medical organisations as professionals and who always need to have their tax affairs in order, may still have to have a cashflow disadvantage as they cannot offset PSWT retained against payroll taxes in real time (albeit the construction sector can offset RCT against other taxes e.g. VAT)

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?

ok

- 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?**

To avoid cashflow disadvantage all medical organisations as professionals should receive gross payments. Our organisation are at approx 500K cashflow disadvantage each year. Have to fund payroll taxes each month while PSWT is retained by Revenue.

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

Professional Services Withholding Tax (PSWT)

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

as recipient in Medical Sector, it severely impacts on our cashflow.

- 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.**

no

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

N/A

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

Mechanism to avoid business owners defaulting on their taxes. This should happen very rarely in medical sector for GPs who hold HSE contracts. They won't get paid unless their tax clearance is up to date so they will always have tax clearance as a priority so shouldn't be penalised by having 12 months + waiting period to access

the PSWT retained by Revenue. Should a medical doctor default on taxes, then this is a matter for individuals and REvenue. Every GP shouldn't have to suffer cashflow disadvantage.

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?

very beneficial from recipient point of view.

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

If Revenue had information in real time, it would be great if we could pay balance payroll taxes for our partnership AFTER taking into account the real time PWST withheld on our behalf.

16. What challenges do you think your business might face in adopting this embedded within natural systems approach?

If example of PAYE modernisation is used, then it cut down on a lot of paperwork for businesses based on our experience as systems worked in real time which was a huge advantage

17. What is the estimated number of payments that you make to SPs each month?

N/A for us but there is 800K with REvenue for our practice for 2025 which we had to fund ourselves

18. Do you currently use software for processing payments and or managing the finances of your business? If so, what packages do you use?

yes, Thesaurus for payroll/AE etc Sage for accounts

19. Are you an employer for PAYE? If so, which software package do you use to report payroll taxes to Revenue?

yes, Thesaurus

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?

Mechanism to avoid business owners defaulting on their taxes. This should happen very rarely in medical sector for GPs who hold HSE contracts. They won't get paid unless their tax clearance is up to date so they will always have tax clearance as a priority so shouldn't be penalised by having 12 months + waiting period to access the PSWT retained by Revenue. Should a medical doctor default on taxes, then this is a matter for individuals and REvenue. Every GP shouldn't have to suffer cashflow disadvanage.

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?

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?

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?

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?

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

Likely to be provided by external providers and built into their package

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

cashflow

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

6 months

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

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)

Greater certainty in relation to your tax affairs

Better visibility and control of information held by Revenue

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

Training or awareness sessions

Helpdesk or dedicated Revenue contact

Clear guidance for software providers and a testing environment

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?

Please look at offsets of PSWT in realtime against payroll taxes to avoid cashflow issues for Medical PRactices.

